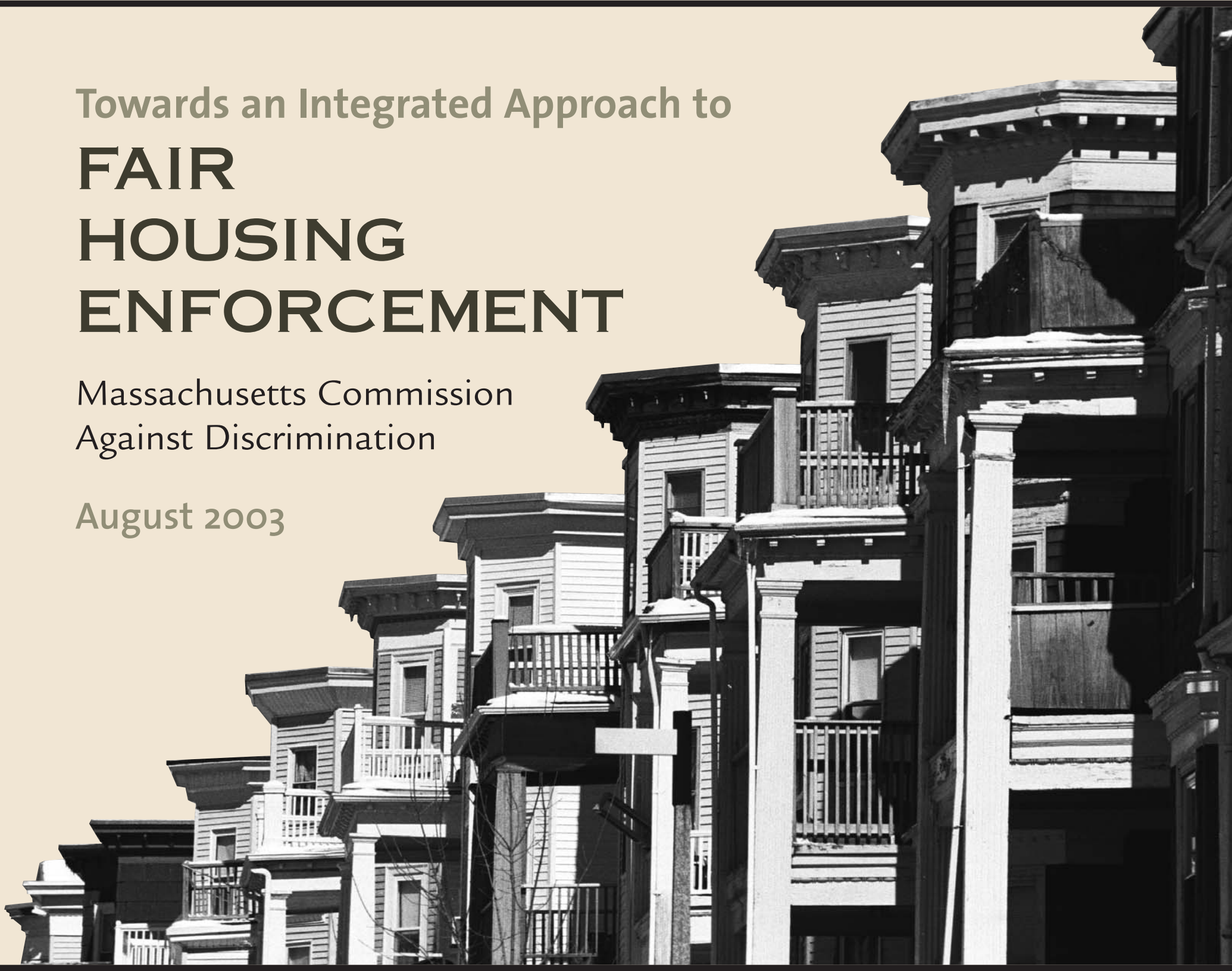


Towards an Integrated Approach to **FAIR HOUSING ENFORCEMENT**

Massachusetts Commission
Against Discrimination

August 2003





Massachusetts Commission Against Discrimination

Dorca Gómez,
Chairwoman

Walter J. Sullivan, Jr.,
Commissioner

Cynthia A. Tucker,
Commissioner



Towards an Integrated Approach to

FAIR HOUSING ENFORCEMENT

Written by
George Cheung,
Principal,
Streetcar Consulting

Research by
George Cheung,
Principal,
Streetcar Consulting

Guy Stuart,
Assistant Professor,
Kennedy School of Government,
Harvard University



Funded by a grant from the
**US Department of Housing and Urban Development,
Office of Fair Housing and Equal Opportunity**

Foreward: Homeownership is the American Dream



Dorca Gómez
CHAIRWOMAN
MASSACHUSETTS COMMISSION AGAINST
DISCRIMINATION

In the past it was very difficult to determine whether all homebuyers were being treated equally in the pursuit of home ownership, including access to mortgages. As a result of innovative 21st century technology this may no longer be the case. Given the complexity and

breadth of the mortgage-lending environment it is encouraging that recent technological advancements can make more readily accessible the information we need to unravel complex issues of discrimination in homebuying.

This report is the result of a two-year comprehensive study funded by a grant from the US Department of Housing and Urban Development and conducted by the MCAD, in conjunction with the Housing Discrimination Project, Inc., and the Fair Housing Center of Boston. The focus of the study was to gather information using innovative technology, to determine whether discrimination in home buying exists in given housing markets. The results of the study were mixed. On the one hand, there was no evidence of overt discrimination against minorities in the targeted areas of this report. This

is an encouraging finding. On the other hand, there are some areas of concern, specifically, in the terms and conditions of mortgage lending, and disparate impact in the availability and affordability of homeowner's insurance for triple-deckers, which tend to be concentrated in minority neighborhoods. As a result of these findings, the MCAD will be initiating enforcement actions in several instances.

Participation in this study has been a challenging and gratifying experience for the MCAD. We have learned from our participation in this novel and cutting-edge housing study and by working co-operatively with our co-recipients of this grant. We are also excited by the prospect of more citizens of the Commonwealth having the opportunity to fulfill their dream of home ownership without fear of discrimination.

This complex research would not have been possible without federal funding from the US Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity. I extend a thank you to our federal counterparts at HUD. I especially wish to thank Marcella Brown, Meryll Gibbs, Mary Sales and Alita Greene for their continued support in allowing us to conduct educational research that will bolster our future housing enforcement efforts in the Commonwealth of Massachusetts.

I also extend a thank you to our partners in the field, Erin Kemple of the Housing Discrimination Project, Inc. in Holyoke, and David Harris of the Fair Housing Center of Greater Boston. This particular partnership between a state law enforcement agency and two non-profit housing advocacy agencies is critical to continued progress in eradicating discrimination at the local level in those communities where discriminatory lending practices may occur.

In addition, I thank our consultants and researchers. While academic research on its own is laudable, to utilize the results of this research to initiate enforcement efforts that effectuate changes in policies and procedures is especially significant.

In closing, if through our combined research efforts and reported findings and recommendations, we have made a small difference in eradicating discrimination in home buying, we should be proud of our contribution.

Acknowledgements

This project was a truly collaborative effort and would not have been possible without the work and dedication of a number of people from seven organizations.

Massachusetts Commission Against Discrimination

Dorca Gómez, Chairwoman
Walter J. Sullivan, Jr., Commissioner
Cynthia A. Tucker, Commissioner
David Fried, Chief of Enforcement
Stephen Lewis, Commission Counsel
Steven Locke, General Counsel
Eric Mehnert, Former Chief of Enforcement
Yvonne Moss, Former Grant Coordinator
Victor Posada, Housing Supervisor
Francisco Villalobos, Compliance Officer

Housing Discrimination Project, Inc.

Erin Kemple, Former Executive Director
Jessica Lynch, Fair Housing Specialist
Jason Larrier, Fair Housing Specialist
Eric Bove, Legal Director

Fair Housing Center of Greater Boston

David Harris, Executive Director
Anita González, Enforcement Coordinator

Streetcar Consulting

George Cheung, Principal

Research Team

Guy Stuart, Assistant Professor, Kennedy School of Government
Susan Rhodes, Research Assistant
Gerald Heng, Researcher
Gaenslie Lamour, Researcher
Andrea Lee, Researcher
Edgar Lee, Researcher
Charlot Lucien, Researcher
Benjamin Metcalf, Researcher
Maria Rosa Montes, Researcher
Ushma Pandya, Researcher
Alastair Smith, Researcher
Sarah Smith, Researcher
Michael Weisner, Researcher
Emily Whiting, Researcher
Deborah Pov Ye, Researcher

US Department of HUD, Office of Fair Housing & Equal Opportunity

Marcella Brown, New England Hub Director
Merryl Gibbs, Program Operations Branch Chief
Mary Sales, Equal Opportunity Specialist
Alita Greene, Equal Opportunity Specialist

National Fair Housing Alliance

Kathy Fletcher, Director of Member Services
Anne Houghteling, Director of Enforcement



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Glossary of Terms



Executive Summary

Under a grant from the US Department of Housing and Urban Development (HUD), the Massachusetts Commission Against Discrimination (MCAD) with its partners—the Housing Discrimination Project, Inc. (HDP), of Holyoke, MA and the Fair Housing Center of Greater Boston (FHCGB) — set out to create a new model of fair housing enforcement. This new model integrates social science research with the established tools of enforcement — fair housing investigations and paired testing. An innovative aspect of this research is the incorporation of geographic information systems (GIS) as a tool that allows civil rights agencies to relate disparate sources of data currently available.

This research was completed in the following five phases:

Phase I: Collect and Analyze Aggregate Data. The MCAD gathered data from the 1990 and 2000 US Census as well as data aggregated under the Home Mortgage Disclosure Act (HMDA) to identify Census tracts with high concentrations of people of color, particularly immigrants.

Phase II: Join Data Using Geographic Information Systems. Home sales records were purchased from a private vendor for ZIP codes corresponding to our selected Census tracts. These records were then “spatially joined” with the Census and HMDA data into a unified database.

Phase III: Design Survey Instrument. To collect data from recent homebuyers, the MCAD created an original survey instrument that included all aspects of the home buying process. The survey was carefully tailored to uncover patterns of discrimination through both process-oriented questions and the collection of data on terms and conditions of real estate transactions.

Phase IV: Conduct Interviews. Over the course of the project, the MCAD completed over 200 interviews in Greater Boston and Worcester County. These interviews were all in-person, typically lasting a little more than an hour and conducted in seven languages and dialects.

Phase V: Analyze Results. The final phase was an in-depth analysis of the data collected. These results were used to inform paired testing by HDP and the FHCGB and other enforcement actions.



General Findings

Finding #1: No Evidence of Overt Discrimination

While a number of interviewees reported negative comments made about particular people of color by real estate agents, there was no evidence of overt discriminatory behavior. (See page 18)

Finding #2: Some Interviews Indicate Unequal Treatment

The MCAD uncovered a number of unscrupulous lending practices including unaffordable monthly payments, excessive closing costs, bait-and-switch of interest rates, and hidden balloon payments. The fact that Latino and African American interviewees were the main targets of these practices strongly indicates unequal treatment. (See page 18)

Finding #3: Some Interviews Indicate Disparate Impact

Many interviewees in urban areas pay between \$1,500 and \$5,000 for annual insurance premiums. People who purchased triple-deckers, in particular, could not find policies outside of the FAIR Plan. An MCAD analysis found a strong correlation between the presence of 3-4 unit buildings with high concentrations of African Americans and Latinos. This correlation suggests redlining by the insurance industry. (See page 19)

Finding #4: Testing Uncovers Some Additional Evidence of Discrimination

Under a subcontract with the Fair Housing Center of Greater Boston, the MCAD conducted 25 tests of real estate agents and insurance companies. Though most of the tests were inconclusive for unequal treatment, the MCAD found that at least one insurance company had the stated policy of not underwriting triple-deckers, which on its face has a disparate impact on African Americans and Latinos. (See page 20)

Finding #5: Evidence of Legal but Disadvantageous Practices

Immigrant homebuyers, in particular, face several challenges including limited English skills, a lack of financial literacy, and absence of a network of family and friends to help them navigate the home buying process. These conditions are exacerbated by legal but disadvantageous practices such as a lack of forms and information in alternative languages, selecting real estate agents of the same ethnicity and allowing agents to make the majority of referrals for other real estate services. (See page 20)



Chapter 1: A New Vision for Fair Housing

Before the passage of the Fair Housing Act in 1968, the face of housing discrimination in home sales was unmistakable. Restrictive covenants were attached to properties that were clearly written to prevent people of color from purchasing in certain communities. The practice by real estate agents to use ignorance and racial stereotypes to induce panic selling by whites, often called “blockbusting,” was blatant and widespread. Financial institutions took maps and drew “red lines” around communities of color, to which they refused to underwrite mortgages.

Today, after more than 35 years of federal legal protections, the face of housing discrimination is subtler. Sub-prime lenders target people of color and the elderly with high interest rates and other disadvantageous terms for home sales and mortgage refinancing. However, the line between sub-prime lending and predatory lending, which may have a disparate impact on protected classes, is hard to draw. Real estate agents, particularly those who work with immigrant homebuyers, may make assumptions about housing/neighborhood preferences and inadvertently engage in racial or ethnic steering. Some insurance companies underwrite relatively few policies in urban neighborhoods with high concentrations of people of color. These practices, in the past decade, have come under closer scrutiny as possibly a new form of redlining.

As the face of housing discrimination has changed, the tools of fair housing enforcement must adapt to remain responsive. However, as they currently function, there are severe limitations that need to be addressed.

Limitations of Fair Housing Investigations

The Fair Housing Act, passed in 1968 with significant amendments in 1988, establishes an administrative procedure for the US Department of Housing and Urban Development and a network of state and local enforcement agencies, including the Massachusetts Commission Against Discrimination, to investigate complaints of housing discrimination. The original model relies heavily on individual “private attorneys general” to pursue the public’s interest in fair and open housing.

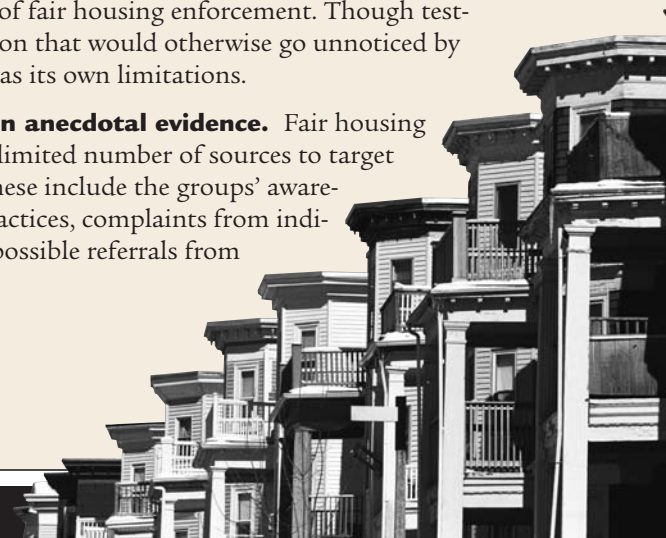
For fair housing enforcement to be more effective, several conditions must be met, including:

- 1. Recognition of problem.** Individuals must be familiar enough with fair housing laws to recognize their situation as one involving a potential civil rights violation. For immigrant communities where English is a second language, understanding the fair housing law is a challenge. Further, issues like steering and insurance redlining are extremely difficult for individuals with limited experience in the home seeking process to recognize.
- 2. Belief in potential for adequate and responsive remedy.** For many people who experience some form of housing discrimination, their most immediate concern is to secure adequate housing. Though filing a complaint with a civil rights agency may help some individuals feel a degree of vindication, many others feel deterred by lack of a timely and adequate remedy for their immediate needs.
- 3. Resources to go through process.** Though filing a complaint does not require the monetary expense of legal counsel, there are a number of other costs associated with the administrative process.

Limitations of Fair Housing Testing

Civil rights agencies and private fair housing organizations may conduct tests to determine if “testers” not belonging to a particular protected class are treated differently from testers or others who do. Testing has become a major component of fair housing enforcement. Though testing can uncover discrimination that would otherwise go unnoticed by individual home seekers, it has its own limitations.

- 1. Basis for testing is often anecdotal evidence.** Fair housing groups typically rely on a limited number of sources to target their testing programs. These include the groups’ awareness of local real estate practices, complaints from individual home seekers and possible referrals from government agencies.



2. Systemic testing is expensive and sporadic. Since the 1988 amendments, there have been several efforts, led by HUD and the Department of Justice, to conduct systemic testing of the real estate industry across the nation. Though this is a more thorough approach to testing, it requires an enormous amount of resources and political will to sustain on an ongoing basis.

3. Mortgage lending testing is difficult. For a successful paired test, testers are usually assigned a profile designed to eliminate factors other than the protected class to account for any unequal treatment. Thus, some elements of their self-depiction are fictitious. It is illegal, however, for testers to lie deliberately on a mortgage application subscribed under the penalties of perjury. Mortgage lending testing is therefore mostly limited to the initial phases of shopping for mortgage products. But discriminatory predatory lending practices are hard to identify until the lender discloses the final terms and conditions of the loan.

Towards an Integrated Approach to Fair Housing Enforcement

Given these limitations to fair housing investigations and paired testing, the Massachusetts Commission Against Discrimination set out to create a new, more integrated approach to fair housing enforcement informed by social science research. Clearly, there is room for fair housing enforcement to incorporate demographics from the US Census, home buying trends from the Home Mortgage Disclosure Act (HMDA) and original research on the experiences of home seekers who may have experienced discrimination first-hand. The challenge for the MCAD was to integrate these resources into a replicable model that brings together and builds off the strengths of fair housing investigations and paired testing.

This report documents the research project undertaken by the MCAD and provides a potential integrated model of enforcement based on this experience. Chapter 2 is a primer on Geographic Information Systems (GIS) and its potential use in civil rights enforcement. Building on this introduction, Chapter 3 delves into the methodologies used in the research project that were based, in part, on an innovative use of GIS. Chapter 4 discusses the findings that indicate potential discrimination and legal but disadvantageous real estate practices. Finally, Chapter 5 articulates recommendations for civil rights enforcement in Massachusetts and beyond.



Chapter 2: GIS and Civil Rights Enforcement

This chapter is an introduction to Geographic Information Systems (GIS) and Civil Rights Enforcement. GIS is the hardware, software and geographic data that allows users to relate and query data from disparate sources that share geography as a common element. First developed as a tool for environmental studies, GIS is now widely used in the fields of archeology, urban planning, and demography. In the area of civil rights, the potential for GIS analysis has remained largely untapped. This project seeks to integrate GIS analysis¹ into fair housing enforcement.

Why is GIS useful in civil rights enforcement?

GIS analysis allows researchers to answer questions that were beyond the capability of civil rights agencies to address:

Fair Housing Research Questions	
Without GIS	Using GIS
How segregated is a metropolitan area?	What boundaries divide communities of different racial/ethnic composition (e.g., streets, school district boundaries, railroad tracks)?
What Census tracts experienced the greatest racial change between 1990-2000? Which homeowners purchased in Census tracts that experienced the greatest racial change between 1990-2000?	Which homeowners purchased in Census tracts that experienced the greatest racial change between 1990-2000?
What housing developments funded by the Low Income Housing Tax Credit (LIHTC) are located in suburban communities that are predominantly white?	What LIHTC housing developments in suburban communities are located within walking distance of mass transit?

How does GIS work?

Most data has some type of geographic component — an address, a street or a Census tract. GIS allows researchers to integrate disparate data sets by building on this common geography with a “virtual map.” In GIS, physical features can be translated into a layer of points (addresses), lines (streets), or polygons (Census tracts). Once these layers are in place, attribute data can be matched to these features and related or queried in a spatial analysis.

For example, take the issue of racial and ethnic steering. A fair housing organization services a metropolitan area that has experienced a large influx of Latinos into certain neighborhoods. From anecdotal evidence, it suspects that some real estate agents engage in racial and ethnic steering, which has contributed to segregation. In response, the fair housing organization wishes to conduct paired testing in sales and rental in order to build a case of systemic housing discrimination. However, due to budgetary constraints, the organization cannot do a comprehensive audit of all real estate agencies in the metropolitan area, but must be selective in choosing its targets. It would like to focus its efforts on real estate agencies closest to these new clusters of Latino residents.

To select the real estate agencies that fit this profile, the fair housing organization would need to collect and relate the following data:

1. Names and physical addresses of real estate agencies in metropolitan area
2. Census data for all neighborhoods in the metropolitan area
3. Home Mortgage Disclosure Act data for the metropolitan area

Though this may seem like a straightforward analysis, differences in the various formats in which the data exists pose a complex problem. The US Census defines particular geographic areas — mainly tracts, blockgroups and blocks — from which it collects and aggregates data. Further, data collected under the Home Mortgage Disclosure Act is reported by Census tract. These two sets of data can be easily related and queried by a number of criteria, such as Census tracts that fit the following description:

1. Latinos constitute at least 50% of all residents (Census)

¹For the purposes of this report, GIS refers only to vector-based GIS.

2. The non-Latino white population decreased by at least 20% between 1990 and 2000 (Census), and
3. Latino homebuyers constitute at least 50% of successful home purchases between 1995 and 2000 (HMDA)

However, the location data for real estate agencies is available only by street address. How does a fair housing organization know which addresses belong or relate to a particular Census tract? The solution lies in finding a common spatial characteristic between these seemingly disparate sources of data.

The process of finding a common spatial characteristic can best be illustrated using a metaphor. Imagine drawing a map of the metropolitan area on a large piece of white paper with a level of detail comparable to a street atlas — city/town boundaries, streets, major bodies of water, etc. Now imagine overlaying this map with a transparency composed entirely of polygons representing Census tract boundaries. From the data collected, each tract has attributed demographic data, which can be colored differently, depending on intensity of value. Taking push pins to represent real estate agencies, each pin is pushed through the base map and the transparency at the appropriate locations. From this example, the fair housing organization is now able to relate the real estate agencies (push pins) to the underlying Census geographies (transparency) and select those targets that best fit the original criteria.

For a description of other GIS data useful for fair housing, see Appendix A1.

For demographic maps of the Commonwealth and metro-Boston, see Appendix A2.

For demographic maps of Worcester County, see Appendix A3



Chapter 3: Methodology

This chapter details the methods used to study the experiences of recent homebuyers in Massachusetts. The study was separated into six distinct phases: collect and analyze aggregate data, join data using GIS, design a survey instrument, conduct interviews, analyze the results and follow up with enforcement actions.

Phase I: Collect and Analyze Aggregate Data

The first phase of the research focused on the collection and analysis of two public data sources — the US Census and data reported pursuant to the Home Mortgage Disclosure Act (HMDA). This step, aside from providing a basic understanding of demographic and home buying trends in the Commonwealth, allowed the MCAD to determine upon which communities its survey research should be focused.

Under the original plan, the research was to focus on two general geographic areas — Greater Boston and Worcester County. “Greater Boston,” for the purpose of this study, is the Boston Consolidated Metropolitan Statistical Area (CMSA) as defined by the U.S. Census Bureau in 1999, plus additional tracts within Worcester County, but excluding CMSA areas outside the boundaries of the Commonwealth. The study area includes 1044 Census tracts (1990).

A. Census Data (1990 & 2000)

The MCAD used Census data from the 1990 and 2000 Census on the block level to provide as much demographic detail as possible about the neighborhood in which prospective interviewees had purchased homes. At the time of this phase, only Summary File 1 (see glossary) of Census 2000 data was available. This data set includes only basic demographic data, identifying individuals within broad demographic groups (Non-Hispanic White, Non-Hispanic Black, Hispanic/Latino, Asian and Pacific Islander, and Other). To ensure data compatibility between 1990 and 2000, the MCAD made two important adjustments. First, the MCAD recoded the 2000 Census data to assign persons self-identifying as multiracial to single-race categories. This is the same method used by the Mumford Center at the State University of New York at Albany, which has conducted extensive research on Census demographics. Second, the MCAD utilized a process of con-

catenating (see glossary) 1990 Census blocks to match up with 2000 blocks according to boundary changes implemented by the Census.

B. Home Mortgage Disclosure Act (HMDA) Data

Originally enacted by Congress in 1975, the Home Mortgage Disclosure Act (HMDA) created public reporting requirements for many financial institutions with respect to mortgage applications. This data has proved essential in determining whether financial institutions are serving the housing needs of their communities and in identifying possible discriminatory lending patterns. The Department of Housing and Urban Development estimates that more than ninety percent of all loan applications are reported under HMDA.

For the purposes of analyzing home buying patterns, only a subset of this data is relevant. This includes only loan applications that were approved on the purchase of an owner-occupied home. Due to general problems with the quality of HMDA data prior to 1993, this analysis only covered the period between 1993 and 2000.

There were a total of 496,412 home purchases in the Boston CMSA recorded in the HMDA data during that period. Once the data was collected, it was aggregated by Census tract for the 8-year period. Racial categories for co-applicants were simplified for easier comparisons.

Phase II: Join Data Using Geographic Information Systems

The second phase was a multi-step process including the selection of target zip codes, the purchase of homebuyer records and the joining of data into a unified database.

A. Selecting target zip codes.

The first step using GIS was to convert the target Census tracts into target zip codes in order to purchase address-based data. With the HMDA data collected in Phase I, MCAD selected all Census tracts in the study area with a high concentration of homebuyers of color. To accomplish this, the aggregated HMDA data records were divided into quintiles by each racial/ethnic category. MCAD selected all

Census tracts that included records in the 3rd quintile or higher for at least one racial/ethnic group. The thresholds for inclusion were the following:

Race/Ethnicity	HMDA Threshold
Asian American	7.6%
Black/African American	12.9%
Hispanic/Latino	11.4%

Once these tracts were identified, they were linked to their respective zip codes and outputted for the next step.

B. Purchase home sales records.

With the list of target zip codes, MCAD purchased home sales records from a private vendor, the Warren Group, the publisher of Banker & Tradesman magazine. This data was compiled from two main sources — local registries of deeds and local tax assessing offices. For the purposes of the research, the MCAD limited the data purchase to one- to four-unit structures sold within the year prior to the research.

This data request resulted in the purchase of 35,335 home sales records. Each record contained the following information:

- › Name of co-applicants
- › Physical address
- › Selling price
- › Amount of mortgage
- › Mortgage lender

C. Create a unified data structure

With the purchase of the home sales records for the target communities, the final step of the aggregate data study was to link these records with the Census and HMDA data. This was critical because it allowed the MCAD to target its survey to ensure it collected data from a racially and ethnically diverse pool of interviewees.

To accomplish this merger of data sources, the MCAD utilized a multi-step GIS process. First, all addresses from the sales records were geocoded or plotted, creating a theme or data layer in a coordinate system. As illustrated in Chapter 2, this is the digital equivalent of pushing a pin through a paper street map to represent a housing unit. Next, the Census and HMDA data layers were superimposed on the sales record layer. Finally, the sales record layer was spatially joined with the other layers, such that each sales record was assigned to a Census tract and block and all of their corresponding demographic data.

The final result of this manipulation is a single, unified spreadsheet that contains the following fields:

Columns	Description
A-D	Identity of primary and secondary mortgagors
E-G	Address of home purchased
H	Sales price
I	Amount mortgaged
J	Mortgage lender
K-U	Demographics of 2000 Census block
V-AA	Percent change between Census 1990 & 2000
AB-AM	Home Mortgage Disclosure Act Data (1993-2000)

See Appendix B for Sample of MCAD Homebuyer Database.

This spreadsheet was then translated into a pivot table in Microsoft Excel, thereby allowing records to be queried using multiple criteria. For instance, one could chose all records with the following criteria:

1. In the City of Boston;
2. In Census blocks where Latinos make up more than 50% of residents;
3. In Census tracts where Latinos made more than 50% of house purchases, and
4. In Census blocks where the White population decreased at least 20% between 1990 and 2000.

Phase III: Design Survey Instrument

Due to the complex and personal nature of the home buying process, MCAD decided on a “hybrid” approach to designing the original survey instrument (See Appendix C for the 2001-2002 Massachusetts Homebuyer Survey). Each section, representing a major phase of the overall process, begins with a general, open-ended question. This allowed interviewees to “tell their stories,” giving a human face to the home buying experience. It also had the added benefit of allowing the researcher to create rapport with the interviewee, a critical step in successfully collecting personal/financial information towards the end of the survey. These open-ended questions were supplemented with targeted questions, mostly related to the terms and conditions of real estate transactions.

There are six main types of data collected by the survey instrument:

A. Preferences

To start the interview, researchers probed interviewees about their motivations for purchasing a home. This included questions concerning:

- > Impetus for relocation
- > Timing of purchase
- > Desired physical characteristics
- > Geographical considerations
- > Economic constraints

- > Other factors (e.g., schools, public transportation, ethnic diversity, etc.)

B. Processes

A critical aspect to uncovering potential discriminatory practices is the complex sets of processes leading to the home purchase. MCAD designed questions pertaining to:

- > Finding information about housing opportunities
- > Selecting real estate related services
- > Working with a real estate agent
- > Getting a mortgage
- > Securing homeowners insurance
- > Negotiating a price and closing the deal

With regard to racial/ethnic steering, the MCAD made a special effort to gauge the extent to which interviewees considered living in a community bordering the city or town in which they chose to live. Ideally, this could uncover factors that led the homebuyers to limit their search, including racial or ethnic steering. To do this, the MCAD asked researchers to look up these communities before the interview and use a three-tiered test (Question 20). This test asked interviews if they:

- i. “Considered living in (town/neighborhood)”
- ii. “Searched for housing in (town/neighborhood)”
- iii. “Looked at actual homes in (town/neighborhood)”

If the interviewee responded negatively, researchers probed for reasons why they did not consider or terminated their search in that area.

C. Terms and Conditions

An essential part of the survey instrument tracks the actual terms and conditions of homeownership. It provided for a direct way to uncover larger patterns of which the homebuyer is typically unaware, such as predatory lending practices and insurance redlining. Such questions addressed:

- > Term of mortgage
- > Interest rates
- > “Points”
- > Closing costs
- > Other terms (e.g., balloon payments, pre-payment penalties)
- > Insurance provider
- > Insurance premiums

In order to collect the most accurate data, researchers were instructed to look for certain documents including the “Truth-in-Lending” statement, the HUD-1 and the monthly mortgage statement.

D. Current Housing Characteristics

With the plethora of housing choices available in the study area, the MCAD also tracked characteristics of the home purchased. This was useful for analyzing social migration trends as well as for investigating potential discrimination based on location or type of home. The survey included questions on:

- > Size
- > Location/Neighborhood
- > Architecture

E. Demographics of Household

At the end of the survey, the MCAD included a pullout section pertaining to the demographics of all householders. This allowed the interviewee to provide information, particularly concerning income and education, with a greater sense of privacy. MCAD tracked the following data:

- > Income
- > Presence of minor children
- > Age
- > Race/Ethnicity
- > Sex
- > Languages spoken
- > Educational attainment
- > Occupation

F. Direct Questioning

Throughout the survey, direct questions relating to discriminatory treatment were asked. These questions addressed whether the interviewees felt the following persons and/or organizations treated them “differently or unfairly” because of their race/ethnicity, or any other reason:

- > Real estate agents
- > Mortgage brokers
- > Loan officers
- > Insurance companies/agents

Phase IV: Conduct Interviews

After completing the aggregate data study, the integration of data sources using GIS and the creation of an original survey instrument, the MCAD was ready to begin the fourth phase — the collection of data from one-on-one interviews. Five steps were involved in the data collection process:

A. Recruit and Train Researchers

The MCAD recruited over a dozen researchers and provided them with a half-day training course. Most had advanced degrees in a social science and several were selected because of their professional experience as homebuyer counselors. As collecting data in immigrant communities was a particular priority, the MCAD hired researchers who were fluent in Spanish, Chinese (Cantonese, Mandarin and Toisanese), Haitian Creole and Khmer. A majority of researchers had first-hand experience in the process of buying a home. For those without direct experience, the MCAD contracted with the Massachusetts Affordable Housing Alliance to conduct a shortened version of their homebuyer-training course.

B. Generate prospect letter based on database

The next step was to extract samples of homebuyers from the unified database and request their participation in the research. This was done with a “prospect letter” that identified the purpose of the research, the voluntary nature of participation and the protection of their identity (See Appendix D for Prospect Letter). By the end of the project, MCAD generated over 10,000 letters requesting interviews in metro Boston and Worcester County.

C. Setting up interviews

Once a batch of letters was sent out, a researcher was given a list of homebuyers, similar to the one in Appendix B, in order to secure interviews. To aid in this process, MCAD devised a standard phone script as well as protocols dictating appropriate hours to call and voice mail messages to leave. When a researcher secured an interview, the MCAD generated a confirmation letter reminding the homebuyers of the appointment and requesting them to make mortgage docu-

ments available for review. (See Appendix E for Confirmation Letter)

D. In-person interviews

Under this project, over 200 interviews were completed. Because of the personal nature of the home buying process, all were completed in-person. At the beginning of each interview, the researcher was required to explain the Consent Form and have the interviewees sign it before continuing (See Appendix F for Consent Form).

A typical interview took place in the homebuyer’s residence on a night or weekend. The range of duration for interviews was between 45 minutes to over 2 hours, with an hour being standard. In appreciation of their time and effort, interviewees were paid a nominal amount (\$25).

E. Post-interview reporting

At the end of each interview, researchers completed several additional tasks. The first was to fill out a “response coding form” that coded answers to roughly half of the questions in the interview into an electronic format. Next, the researcher completed a simpler form that describes activities that either they or the interviewees felt were potentially discriminatory. This was particularly helpful in the analysis to quickly scan interviews for an enforcement-related response. Finally, the researchers returned the survey books and forms to the research project staff and attended periodic debriefing sessions.

Phase V: Analyze Results

The next part of the research was data analysis. The MCAD contracted with a Research Assistant who has a civil rights background to meticulously review each interview with an eye toward potential fair housing enforcement actions. The Research Assistant’s work included:

- Listening to tape recordings of interviews
- Checking booklets and coding sheets for accuracy
- Reviewing “potential discriminatory practice” sheets for immediate enforcement action
- Identifying “outlier” data (e.g., unusually high interest rates, large prepayment penalties) for closer inspection

After the Research Assistant selected interviews with “outlier” data, an enforcement committee met to examine each case to determine what type of enforcement actions, if any, should be taken.

Phase VI: Enforcement Follow-Up

The final phase of the research was to link the findings into enforcement actions. These actions were composed of paired testing, additional interviews, additional GIS analysis, and the filing of complaints.

A. Paired Testing

The MCAD partnered with the Housing Discrimination Project, Inc., and the Fair Housing Center of Greater Boston to conduct follow-up paired testing in the areas of home sales and insurance. Geographically, tests were conducted in Greater Boston and Worcester County. Particularly in interviews where the Research Assistant determined the potential for racial/ethnic steering, the MCAD shared pertinent data from the interview with the fair housing groups to refine their testing efforts. This included

- > Name and address of the real estate agent(s)
- > Demographic and occupational data on home seekers
- > Housing type desired
- > Type of potential discriminatory treatment

B. Additional Interviews

In several cases regarding mortgage lending where testing was not appropriate, the MCAD attempted to secure additional interviews from similarly-situated homebuyers to determine if there was differential treatment based on a protected class. In one case, an interview uncovered a hidden balloon payment. The MCAD went back to the unified database of homebuyers, matched those who used the same lender and instructed researchers to conduct additional interviews within this pool.

C. Additional GIS Analysis

In a review of the outlier data with respect to insurance premiums, the MCAD uncovered a general practice that while on its face may seem non-discriminatory, may in fact have a disparate impact on

communities of color. In order to assess this, the MCAD conducted a further analysis of Census data relating demographics to housing type. See Finding 3 for more details.

D. File Complaints

After the research, the MCAD created a separate protocol to identify interviews where there was enough evidence for a prima facie case of discrimination and to contact individual interviewees to file complaints. Nine interviews fit the prima facie case criteria. Out of the nine, several did not respond to repeated attempts to contact them. Further, three interviewees who were subjected to predatory lending practices were able to refinance their mortgages and were not interested in pursuing a fair housing complaint.

By the end of the project, the MCAD, in conjunction with the Housing Discrimination Project, Inc., filed twelve individual cases of housing discrimination, seven of which were also dual-filed with the US Department of Housing and Urban Development. The MCAD was also determining whether to file commission-initiated complaints against insurance companies that refuse to underwrite triple-deckers, creating a disparate impact on African Americans and Latinos. Investigations of these complaints would determine whether this policy is a business necessity or a pretext for discrimination.



Chapter 4: Findings

This chapter identifies trends in the data collected from interviews. Because the project was focused on identifying discriminatory activities in areas where they are more likely to occur, the research population is not representative of the population of the Commonwealth. As such, the following trends are not necessarily statistically significant, but rather, illustrative of the types of housing discrimination that homebuyers face.

Finding #1: No Clear Evidence of Overt Discrimination

The MCAD did not find any direct evidence of housing discrimination. There were a handful of interviews where race seemed to be on the periphery of conversations with real estate agents. One interviewee, a white woman, reported that her real estate agent voluntarily disclosed the racial composition of a condominium development she was visiting. Another interviewee, a white man, reported that his real estate agent made negative comments about the neighbors. Though their race was not mentioned, the interviewee noticed they were African American. Neither of these incidents rises to the level of overt discrimination, but does raise some questions on propriety and professionalism.

Finding #2: Some Interviews Indicate Unequal Treatment

The MCAD uncovered a number of unscrupulous practices, particularly in mortgage lending. The research identified 14 interviews where there were unusual terms and conditions. Out of these interviews, African Americans and Latinos were the targets in 10 of them, indicating unequal treatment based on race and ethnicity.

Interest Rate Bait-and-Switch

The research shows a disturbing trend of confusion and potential abuse around interest rates. Though mortgage lenders have a legal obligation to offer a “lock-in” of an initially quoted interest rate, many interviewees were unaware of this requirement and stated they were not given this opportunity. In three cases, homebuyers were told at or near the closing that the interest rate had suddenly increased, anywhere from 0.5 – 0.9%.

Double Mortgages

In at least two instances, the research has uncovered a deceptive, double-mortgage practice. In these cases, mortgage lenders split the amount into two, seemingly identical mortgages. However, upon closer inspection, researchers found hidden balloon payments on one of the two mortgages. The most egregious case was an interracial couple that had thought they agreed to two 15-year self-amortizing mortgages. Unbeknownst to them, the second mortgage included a balloon payment of \$96,000. The other case involved a hidden balloon payment of over \$22,000.

Excessive Interest Rates

At a time of near historically low interest rates, several interviews showed extremely high APR's of between 10-13%. From the research, however, it is not clear that these interviewees had particularly poor credit scores and should have qualified for more conventional loan products.

High monthly payments

The generally accepted rule of thumb is that homeowners should avoid paying more than 1/3 of their gross income on housing. However, several interviewees of relatively modest means (\$20-40K annual household income) were approved for large mortgages and hefty monthly payments of between \$1,500 and \$1,700. This is indicative of predatory lending that is meant to strip away equity and pressure homebuyers to default.

High Closing Costs

It is clear to anyone who has purchased a home that the closing can be a confusing and intimidating experience. However, it is not clear to all homebuyers that many of the charges associated with the closing are negotiable. For three homebuyers, the MCAD recorded exorbitant closing costs, one of almost \$10,000. All of these homebuyers were African American or Latino.

Finding #3: Some Interviews Indicate Disparate Impact in Insurance

An analysis of data collected on homeowners insurance reveals a strong potential for redlining (See Glossary). The most striking pattern was that people, virtually all Blacks and Latinos, who purchased triple-deckers rarely found policies outside of the FAIR Plan (the industry-sponsored insurer of last resort). Annual premiums for these FAIR Plan policies ranged from \$1,500 to over \$3,000, significantly higher than premiums for single-family homes.

This pattern is supported by research done by housing advocates including the Massachusetts Affordable Housing Alliance (MAHA). In May 1996, the Massachusetts Legislature enacted the Insurance Anti-Redlining Act, which created disclosure requirements for property insurers similar to those under the Home Mortgage Disclosure Act. Based on this data and from anecdotal evidence, MAHA has recommended a closer examination of this problem in its latest annual report, *Insuring Neighborhoods VI*:

While few, if any, companies have formal underwriting guidelines that prevent them from writing policies on homes with flat roofs, anecdotal evidence suggests many private insurers will not write policies for these homes. In many urban communities, triple-deckers make up as much as two-thirds of the market. Private insurers have not yet come forward with loss data to support their rationale for avoiding this market. This lack of attention has resulted in the Fair Plan being the insurer of most of these properties.

The issue for civil rights enforcement is whether or not the pattern and practice of redlining triple-deckers with flat roofs has a disparate impact on people of color, particularly Blacks and Latinos. To answer this question, the MCAD conducted an additional GIS analysis of 2000 Census data. The MCAD collected demographic and housing characteristic data for the Boston Primary Metropolitan Statistical Area (PMSA). Though the Census did not track “triple-deckers” per se, the MCAD used “3-4

unit houses” as a proxy. Given the prevalence of triple-deckers in the Southern New England region, this seemed like an appropriate assumption.

	A	B	C
	Entire Boston PMSA	Blockgroups with greater than 50% 3-4 Units*	Blockgroups with greater than 75% 3-4 Units
Total Population	3,405,940	130,864	14,548
White Alone	80%	38%	24%
Non-White	20%	62%	76%
Asian Alone	5%	7%	7%
Black Alone	6%	24%	31%
Latino (any race)	6%	23%	26%

* MCAD used Census blockgroups to aggregate demographic and housing characteristic data. To determine the appropriate blockgroups for Columns B and C, the MCAD compared the total housing units in those blockgroups with the number housing units in 3-4 unit buildings. “>50% 3-4 Units” means a majority of housing units are in 3-4 unit buildings.

This analysis shows a strong correlation between the presence of 3-4 unit buildings with concentrations of African Americans and Latinos. Whites make up 80% of the total population but less than half of all residents in areas where 3-4 buildings make up the majority of the housing stock. Conversely, Blacks compose only 6% of all residents in the Boston PMSA but are more than five times more likely to live in areas where 3-4 units buildings make up at least 75% of the housing stock.



Finding #4: Testing Uncovers Some Additional Evidence of Discrimination

Under a subcontract with the Fair Housing Center of Greater Boston, the MCAD conducted 25 tests of real estate agents and insurance companies. These businesses were identified in the research as engaging in potentially discriminatory practices. The first set of 10 tests was conducted on real estate agents that may have engaged in unequal treatment including racial/ethnic steering. This included initial phone inquiries, on-site visits and viewing of properties for sale. The results from this effort did not uncover sufficient evidence to warrant any filing of complaints.

The second set of 15 tests on insurance companies did reveal some evidence of discrimination. The MCAD and FHCGB designed the initial tests to determine if homeowners of triple-deckers were treated unequally based on the racial composition of their neighborhoods. Based on this design, there was no evidence that supported this hypothesis. However, in the process of these tests, one insurance company told testers that the company only wrote policies for single family houses and duplexes and not for triple-deckers. The MCAD suspects other companies may have the same policy, though it was not disclosed in other tests. Based on the demographic research outlined in Finding #3, the policy of refusing to underwrite triple-deckers has, on its face, a disparate impact on African Americans and Latinos.

Finding #5: Evidence of Legal But Disadvantageous Practices

Immigrant homebuyers, in particular, face several challenges including limited English skills, a lack of financial literacy, and an absence of family and friends familiar with the home buying process. These conditions are exacerbated by legal but disadvantageous real estate practices such as a lack of forms and information in alternative languages and over-reliance on real estate agents of the same ethnicity who typically provide the vast majority of referrals to other real estate-related services.

Low financial literacy in immigrant communities

The MCAD study found a disturbing trend of low financial literacy, particularly in immigrant communities. This is clearly exacerbated by the lack of access to documents and services in alternative languages. Though the state's network of homebuyer counseling agencies provides low-cost and effective workshops on the entire process, many immigrant homebuyers go underserved or seek education very late in the home buying process. This language and education barrier creates the potential for abuse by unscrupulous real estate professionals. It is also an important opportunity for policy makers and non-profit housing groups to help new homebuyers realize the American Dream.

Many select agents of same race

Many home seekers selected real estate agents of their own race or ethnicity. Particularly for immigrants who speak little English, finding an agent with whom they can communicate effectively is important. However, the MCAD is concerned that this may limit one's housing opportunities. For instance, if an Asian agent in a firm is given greater access to listings in Asian neighborhoods and only limited access to others an indirect form of racial steering may occur. This may also be the case if a Latino agent assumes that Latino clients would prefer to live in areas with ethnic markets and Catholic churches with bilingual services.

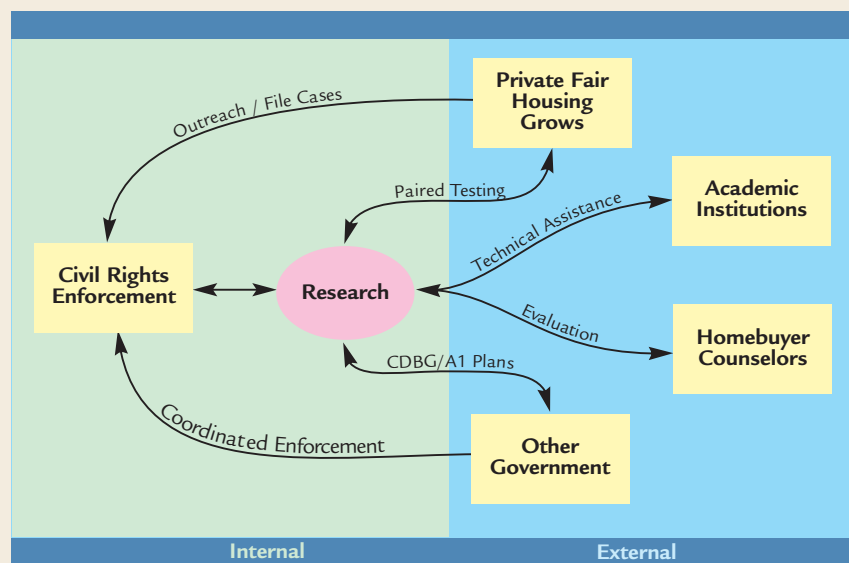
Heavy reliance on real estate agents for other referrals

A majority of interviewees stated that their real estate agent provided referrals to one or more real estate related services. These include mortgage lending, legal representation, inspection services and homeowners insurance. Additionally, a significant number of interviewees were under the false impression that the real estate agent represented them in the process, as agent disclosure forms were either not fully understood when provided or not provided at all. These two trends prevent homebuyers from shopping around for the best deals and create the potential for collusion or other unethical activities.

Chapter 5: Recommendations

Recommendation #1: Institutionalize policy & research component as part of a new model of fair housing enforcement

From the experiences of this project, it is clear that an institutionalized research component can augment the capacity of both traditional components of fair housing enforcement — paired testing and investigations. Research can lead to better targeting of testing through the sharing of information on potential offenders and the creation of mock tester profiles. Investigative work can focus on systemic patterns and practices that are otherwise difficult to uncover.



The model can also incorporate organizations that are not directly involved with fair housing issues. Academic institutions can provide valuable technical assistance and a pool of potential researchers to carry out high-quality data collection. In exchange, this data can address a plethora of other housing-related research topics. Recommendations #2

and #3 address other potential points of coordination with homebuyer counseling programs and community development planners, respectively. Finally, civil rights agencies can work collaboratively with other law enforcement agencies to address non-civil rights violations that present serious barriers to homeownership.

As the core mission of a civil rights agency is to eliminate discrimination, an ongoing policy and research should not be viewed as a luxury, but a core aspect of its functions. In essence, it is the key to moving beyond a mostly reactive model.

Recommendation #2: Develop relationship with homebuyer counseling programs

The MCAD should develop closer ties with groups, such as the Citizens Housing and Planning Association, that oversee homebuyer education programs so that the body of research and any follow-up work can serve as post-counseling evaluation. This will ensure that education provided to consumers is responsive to their needs.

From the research completed, homebuyer education providers need to incorporate the following information and advice in their curricula:

1. Most real estate agents represent the seller, not the buyer
2. Shop around for real estate related services, especially the real estate agent
3. Find an independent attorney
4. Many terms and conditions are negotiable
5. Be aware of how to lock-in an interest rate
6. Insurance may be an unexpected cost, particularly for triple-deckers
7. Look for deceptive practices such as hidden balloon payments and split mortgages
8. Contact HUD, MCAD, HDP and FHCGB if you feel you have been treated unfairly

Recommendation #3: Form partnerships with local planners

The MCAD and municipal planning officials should form a partnership whereby data collected and analyzed by on-going research efforts can directly inform local initiatives on fair housing planning.

Since 1995, communities that receive funding from the US Department of HUD under programs including the Community Development Block Grant Program (CDBG), Home Investment Partnership (HOME), Housing Opportunities for Persons with AIDS (HOPWA) and Emergency Shelter Grant (ESG), are required to complete a “Consolidated Plan.” As part of this plan, communities must certify that they are “affirmatively furthering fair housing” in its policies and procedures. The main part of the certification is to conduct a study called the Analysis of Impediments to Fair Housing (AI).

Though the AI requirement seems like a good policy to address removing barriers to fair housing, the actual practice on the local level has been inconsistent with regard to depth and breadth of analysis. In Massachusetts, the City of Boston completed a lengthy and thorough AI that documents a number of city policies and other factors that affect fair housing. However, a number of local communities have completed AI’s that state there are no fair housing problems in their communities without providing any evidence. Further, most plans are narrowly focused and do not address the regional nature of housing discrimination and segregation.

From MCAD’s regulations, it is clear that the agency has the ability to monitor local government with respect to fair housing (See Appendix G). Under the regulations, if the MCAD deems that a city or town is acting in conflict with fair housing principles, it has the power to recommend to the Department of Housing and Community Development that it withholds certain types of state and federal funding. The Analysis of Impediments to Fair Housing, which was developed after the promulgation of these regulations, is an ideal venue from which to use this regulatory power and engage local governments around fair housing. The

continuation of the type of research conducted under this grant can directly support local governments in their efforts to design and implement policies and procedures that fully address fair housing needs.

Recommendation #4: Conduct further investigations on insurance redlining of triple-decker houses

Based on this research and research conducted by advocacy groups, the issue of insurance redlining of triple-decker houses clearly needs to be addressed. Not only is this style of architecture prevalent in many urban communities in Massachusetts and Southern New England, it also represents a valuable source of affordable housing in an already constricted market.

From the statistics, a policy of not underwriting triple-deckers qualifies as a prima facie case for discrimination under a disparate impact theory. Since there is no available documentation on loss statistics, the MCAD should conduct further investigations to determine if there is a business necessity for this prohibition and if there are any less restrictive alternatives. Further, the MCAD, the administrators of the FAIR Plan and all other stakeholders should convene discussions on policy reforms that can alleviate the financial burden of these policies, either by promoting more competition in the market or by other means.



Afterword



Guy Stuart

ASSOCIATE PROFESSOR,
KENNEDY SCHOOL OF GOVERNMENT, HARVARD UNIVERSITY

The findings outlined in this report justify the comprehensive and integrated approach taken in the MCAD study. The home buying process is a complex one, and discrimination can take place in myriad ways.

The housing market has three major characteristics that remain a challenge to home buyers wishing to buy a home without suffering the iniquities of discrimination: racial and ethnic segregation, now reproducing itself in the suburbs; the persistence of racial and ethnic disparities in the rate at which people are approved for loans in the conventional prime loan market; and the rise and spread of subprime lending.

Segregation in the U.S. persists. Table 1 (see illustrations on next page) shows the extent to which minorities are still experiencing segregation in the nation's metropolitan areas. An index of 100 indicates a completely segregated area, while an index of 0 indicates complete integration. African-Americans did make some progress during the 1990s, but the data indicate that segregation may be intensifying for Latinos. Furthermore, despite breaching the color line between city and suburb, minorities are still experiencing segregation because the color line is being reproduced in the suburbs.

Segregation levels in the suburbs of the 10 metropolitan areas with the largest suburban populations in the nation are similar to those in the central cities of those metropolitan areas (Table 2). In a study conducted for the Civil Rights Project at Harvard University on the Chicago metropolitan area I found that African-American and Latino children are highly segregated from White children at the school district level in the suburbs. In other words, minority and White children are unlikely to be able to go to school with each other because they do not even live in the same school district.

Obstacles in the prime loan market persist. Minority homebuyers also face a problem in gaining access to mortgage loans. Despite some progress in the late 1990s, African-American and Latino applicants for conventional prime home purchase loans are far less likely to receive a loan

than are White applicants. HUD's own national-level data for 2001 show the disparities in approval rates for prime loans, while also showing the much smaller disparity in the approval of FHA loans (Chart 1). In my book, *Discriminating Risk* (Cornell University Press, 2003), I document the various ways in which a loan applicant can fail to get a home purchase loan. The purpose of the study was not to document instances of discrimination, but to show how the mundane decisions of loan officers and underwriters can affect the loan outcome, even in an automated underwriting environment. These mundane decisions add up to a huge societal impact.

Minorities rely more heavily on subprime lenders. While minorities face problems in the prime loan market, the subprime market continues to be a source of loan funds. Though the greatest subprime activity is in the refinance market, minority home purchasers, especially African-Americans, are using subprime loans to finance their home purchases (Chart 2). In a market where information is hard to find and interpret, consumers are extremely vulnerable to overcharging by unscrupulous loan officers and lenders.

Segregation, approval rate disparities in the prime market, and subprime lending to minority home buyers are not isolated characteristics of the housing market. They are interrelated manifestations of the persistence of a dual, separate and unequal, housing market in the U.S. Segregation enables subprime lenders to target minority housing markets more easily, and prime lenders to avoid them more easily. Furthermore, to the extent that Whites still constitute a major part of the home buying market in most parts of the country, their absence from minority markets limits the marketability of properties located there. These practices can weaken minority markets, reinforcing White fears about the impact of a minority presence in their neighborhood and resulting in a self-fulfilling prophecy.

This prophecy is not inevitable, but to prevent it from being so requires the active intervention of fair housing groups, state agencies and HUD. The MCAD study has demonstrated a state of the art method for monitoring the workings of the housing market. It has provided information that can be used to develop targeted interventions to prevent abuses in the market. The study should be replicated across the nation's major metropolitan areas, and replicated over time.

Table 1

331 Metropolitan Areas # with Dissimilarity Index				
Races/Ethnicities	Year	<50	50-75	75+
White and Black	1990	121	184	26
White and Black	2000	152	170	9
White and Latino	1990	282	49	0
White and Latino	2000	270	60	1
White and Asian	1990	298	33	0
White and Asian	2000	322	9	0

Source: Lewis Mumford Center, SUNY Albany, 2002; author's calculations

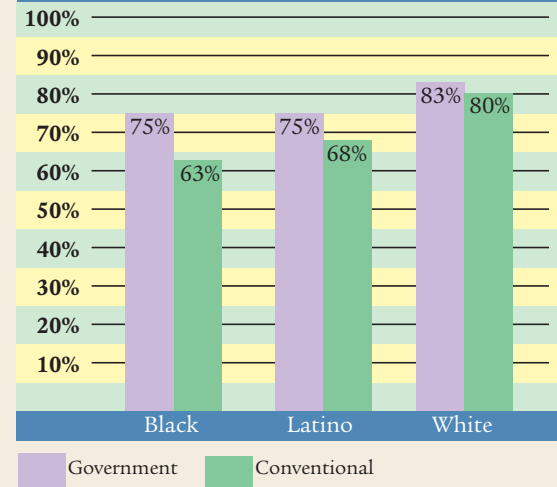
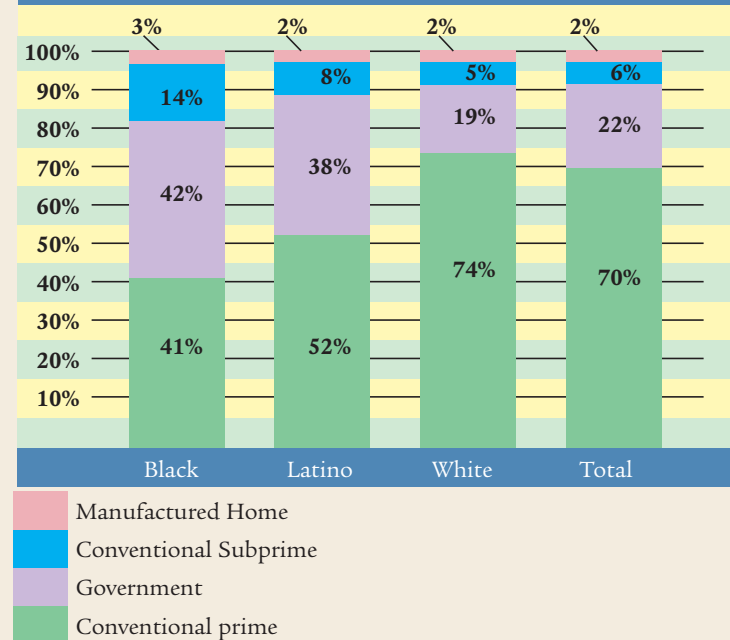
Chart 1

Table 2
Top Ten Largest Suburban Metropolitan Areas
Black and Latino Segregation, 2000

	Suburban Population	Black-White		Latino-White	
		Suburban Segregation	Central City Segregation	Suburban Segregation	Central City Segregation
Los Angeles-Long Beach, CA PMSA	5,110,342	67.69	67.53	62.01	64.50
Chicago, IL PMSA	4,883,879	73.40	82.52	54.03	59.21
Washington, DC-MD-VA-WV PMSA	4,089,595	57.77	79.38	47.29	55.30
Atlanta, GA MSA	3,695,724	61.83	81.64	52.11	57.79
Philadelphia, PA-NJ PMSA	3,503,477	58.08	76.70	41.80	68.24
Detroit, MI PMSA	3,293,831	65.40	72.84	24.49	60.04
Nassau-Suffolk, NY PMSA	2,753,913	74.38	82.91	47.18	66.91
Riverside-San Bernardino, CA PMSA	2,613,764	46.21	46.97	43.30	41.60
Boston, MA-NH PMSA	2,536,940	45.26	66.38	48.56	51.14
Minneapolis-St. Paul, MN-WI MSA	2,299,037	44.56	50.36	30.69	46.51

Source: Lewis Mumford Center, SUNY Albany, 2002; author's tabulations

Chart 2

Useful GIS Data for Fair Housing

By George Cheung

Point Data		
Type of Point Data	Data Set	Sample Attributes
Address	Home sales records	Homebuyer, sales amount, mortgage lender
	Bank branch and real estate agency locations	Loans processed, ATM availability
	Public schools	Student demographics, free/reduced lunch program participation
Coordinate (longitude/latitude)	Low Income Housing Tax Credit developments	Type of development, number of units, developer
	Hazardous waste sites	Type and level of pollutants emitted per year

Line Data		
Type of Line Data	Data Set	Sample Attributes
Transportation Grid	Street network	Street names and addresses
	Mass transit lines including subway and buses	Route name/number
Natural Physical Features	Rivers and other waterways	Name of waterways, presence of pollutants

Polygon Data		
Type of Polygon Data	Data Set	Sample Attributes
Census TIGER® Files (Topologically Integrated Geographic Encoding and Referencing System)	Demographics	Population, race, income, educational attainment
	Housing Characteristics	Number of units, year of construction, housing tenure
	Home Mortgage Disclosure Act (HMDA)	Mortgage data by financial institution and by race and gender of applicants (Census Tract only)
Other governmental administrative boundaries	Land parcel	Current owners, tax assessing valuation
	Zoning	Types of development allowed
	Election precincts	Number of registered voters, voter turnout
	School districts/school assignment zones	Spending per pupil, classroom size
	Zip Code Tabulation Areas (ZCTA)	Demographics, housing units

Other Useful Data		
Type of Other Data	Data Set	Sample Uses
Imagery	Aerial Photography and Satellite Images	Provides visual context for other GIS data

M-1 Distribution of Latinos

Boston Metro
By Census Tract: 2000

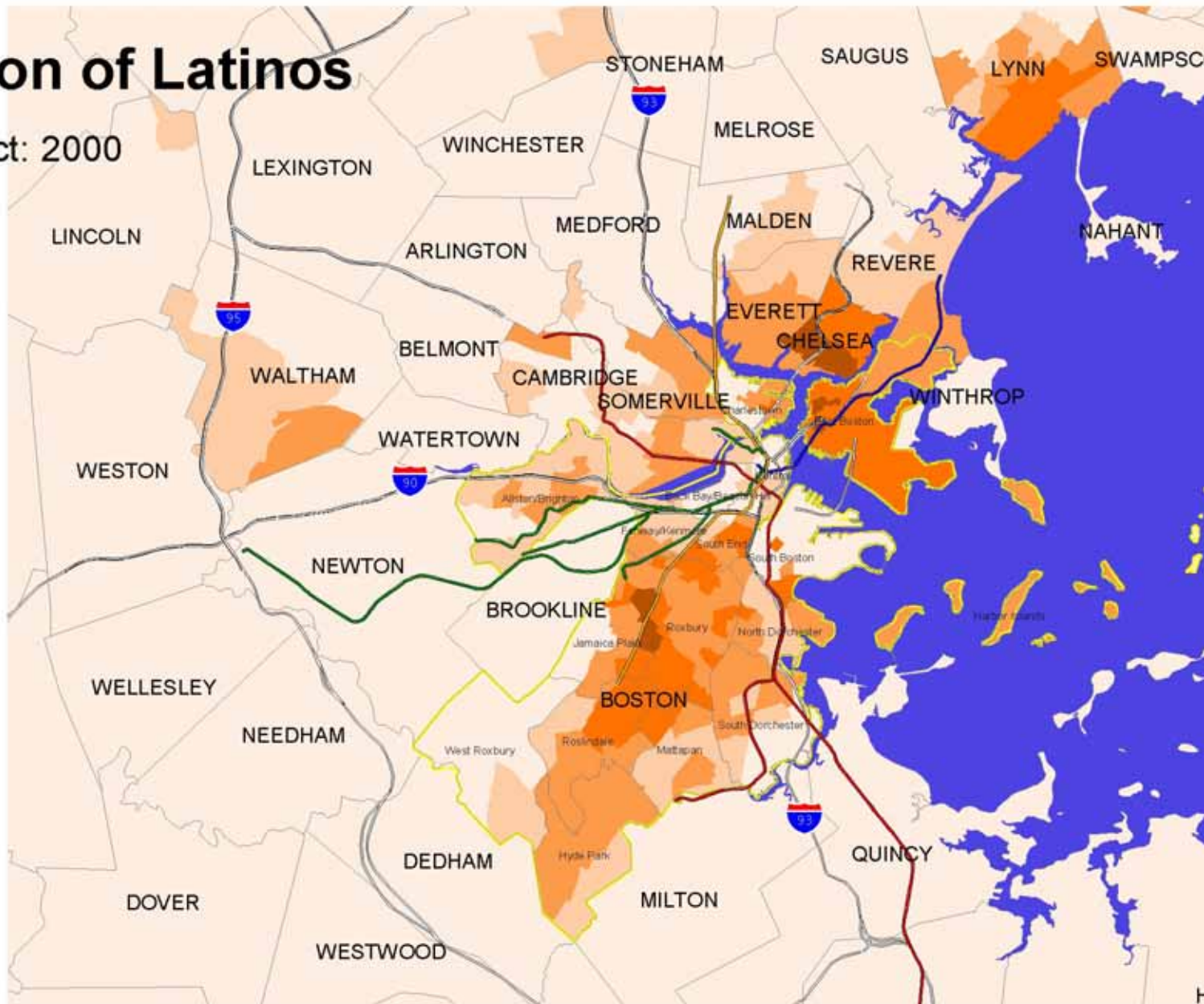
MBTA Subway Lines

- Blue
- Green
- Orange
- Red

City of Boston

Distribution of Latinos

- Under 5%
- 5 - 9.9%
- 10 - 24.9%
- 25 - 49.9%
- 50 - 74.9%
- Over 75%



M-2

Distribution of African Americans

Boston Metro

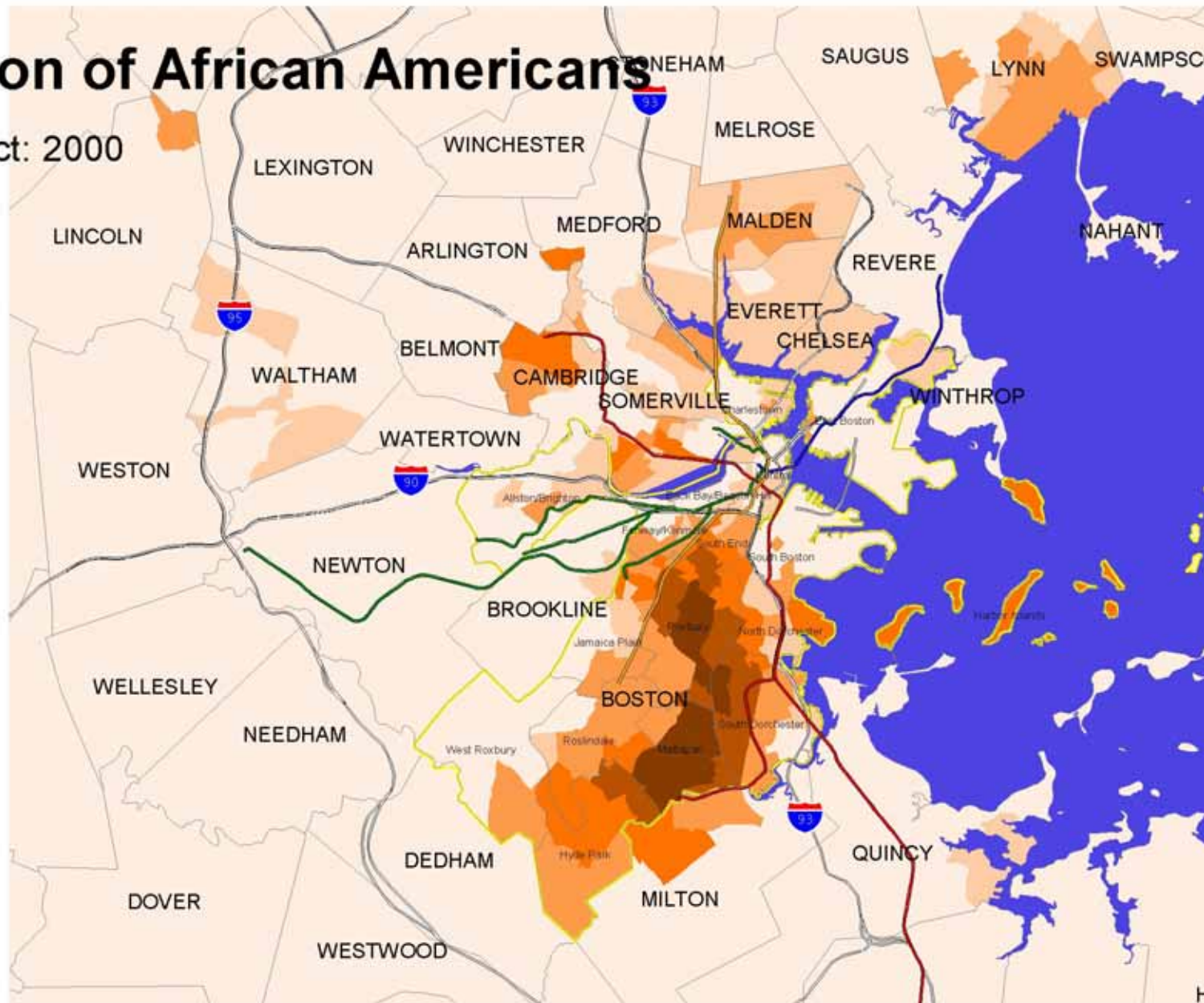
By Census Tract: 2000

MBTA Subway Lines

- Blue
- Green
- Orange
- Red
- City of Boston

Distribution of African Americans

- Under 5%
- 5 - 9.9%
- 10 - 24.9%
- 25 - 49.9%
- 50 - 74.9%
- Over 75%



M-3

Distribution of Asian Americans

Boston Metro

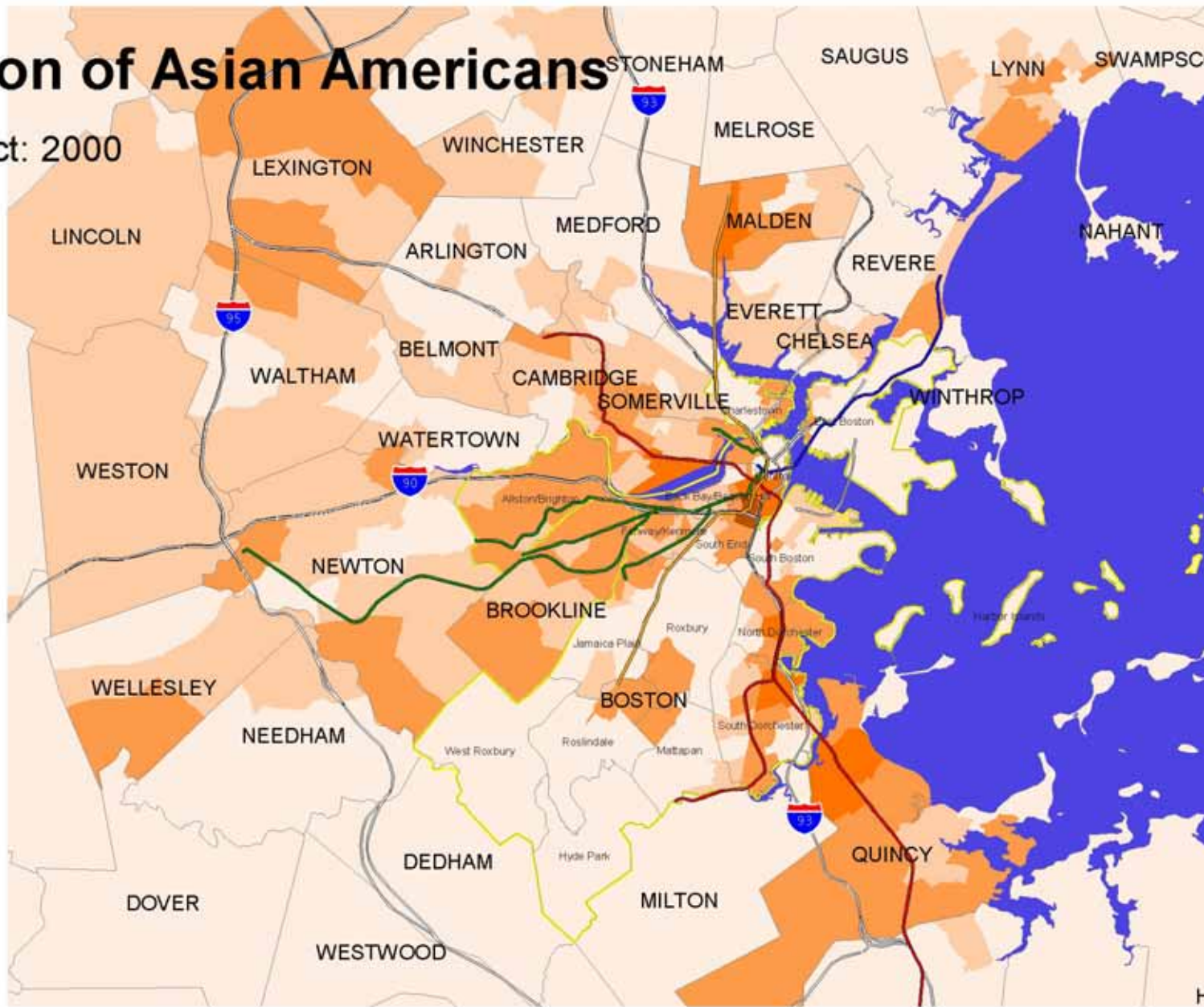
By Census Tract: 2000

MBTA Subway Lines

- Blue
- Green
- Orange
- Red
- City of Boston

Distribution of Asian Americans

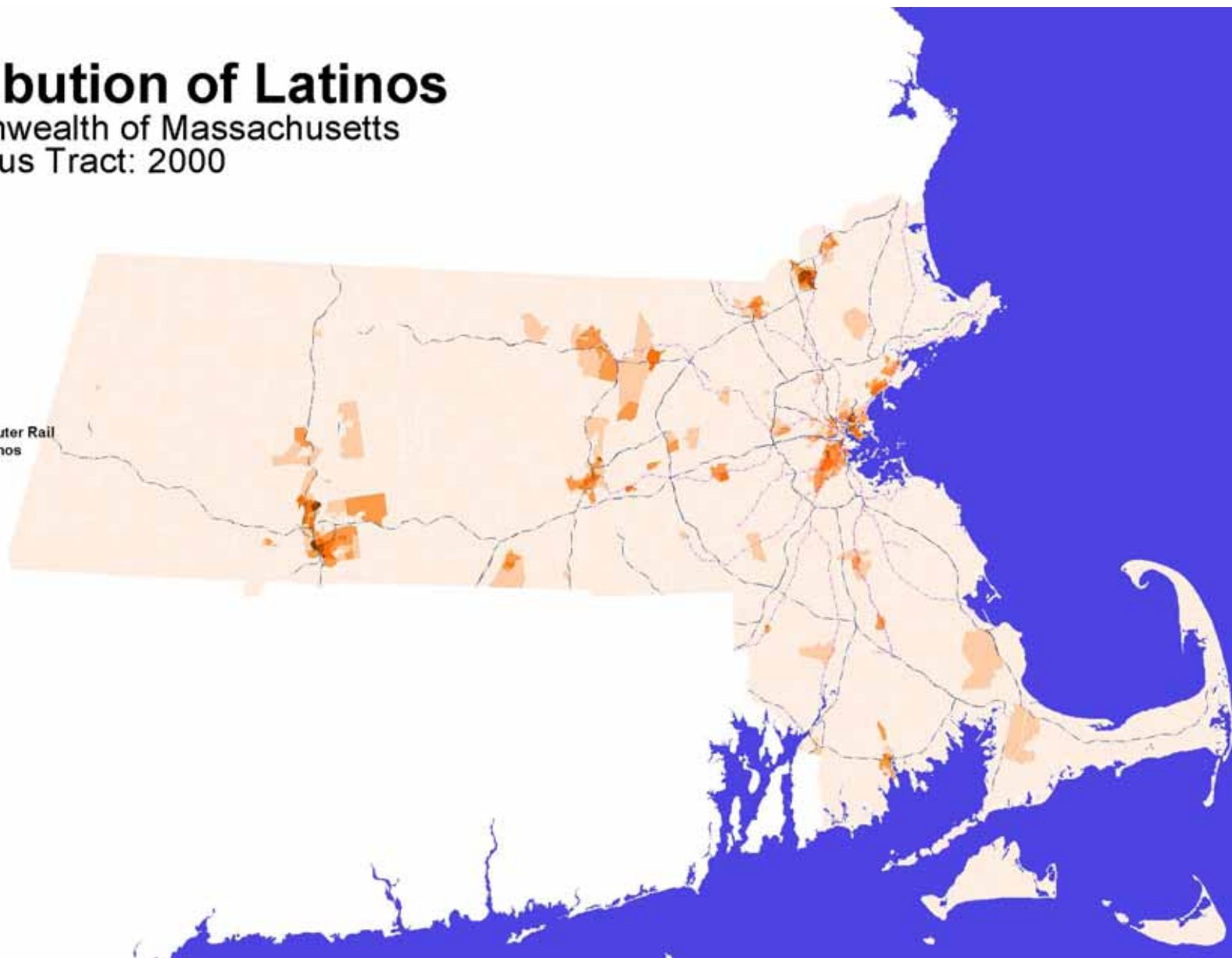
- Under 5%
- 5 - 9.9%
- 10 - 24.9%
- 25 - 49.9%
- 50 - 74.9%
- Over 75%



M-4
Distribution of Latinos
Commonwealth of Massachusetts
By Census Tract: 2000

MBTA Commuter Rail
Distribution of Latinos

Under 5%
5 - 9.9%
10 - 24.9%
25 - 49.9%
50 - 74.9%
Over 75%

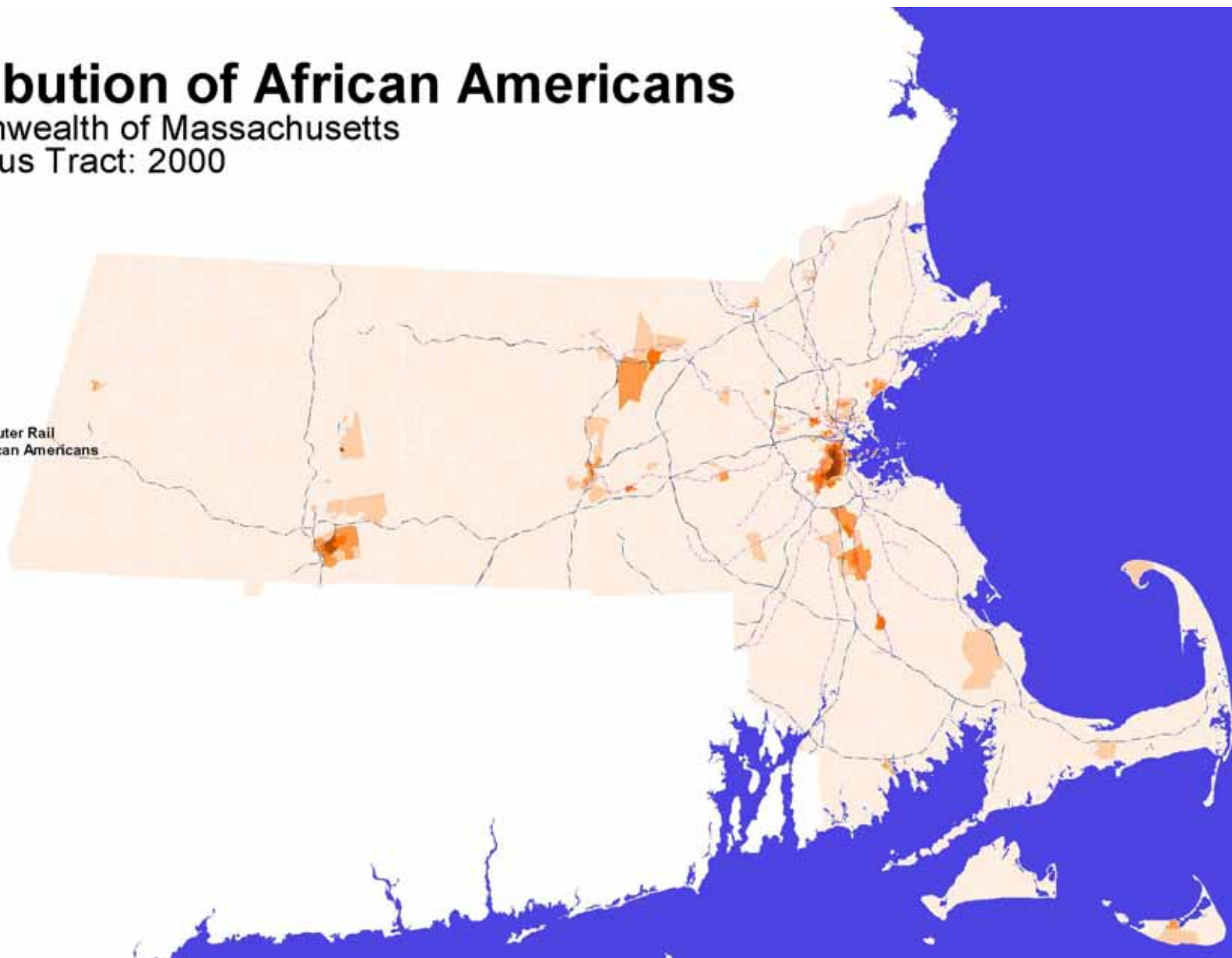


M-5 Distribution of African Americans

Commonwealth of Massachusetts
By Census Tract: 2000

MBTA Commuter Rail
Distribution of African Americans

Under 5%
5 - 9.9%
10 - 24.9%
25 - 49.9%
50 - 74.9%
Over 75%

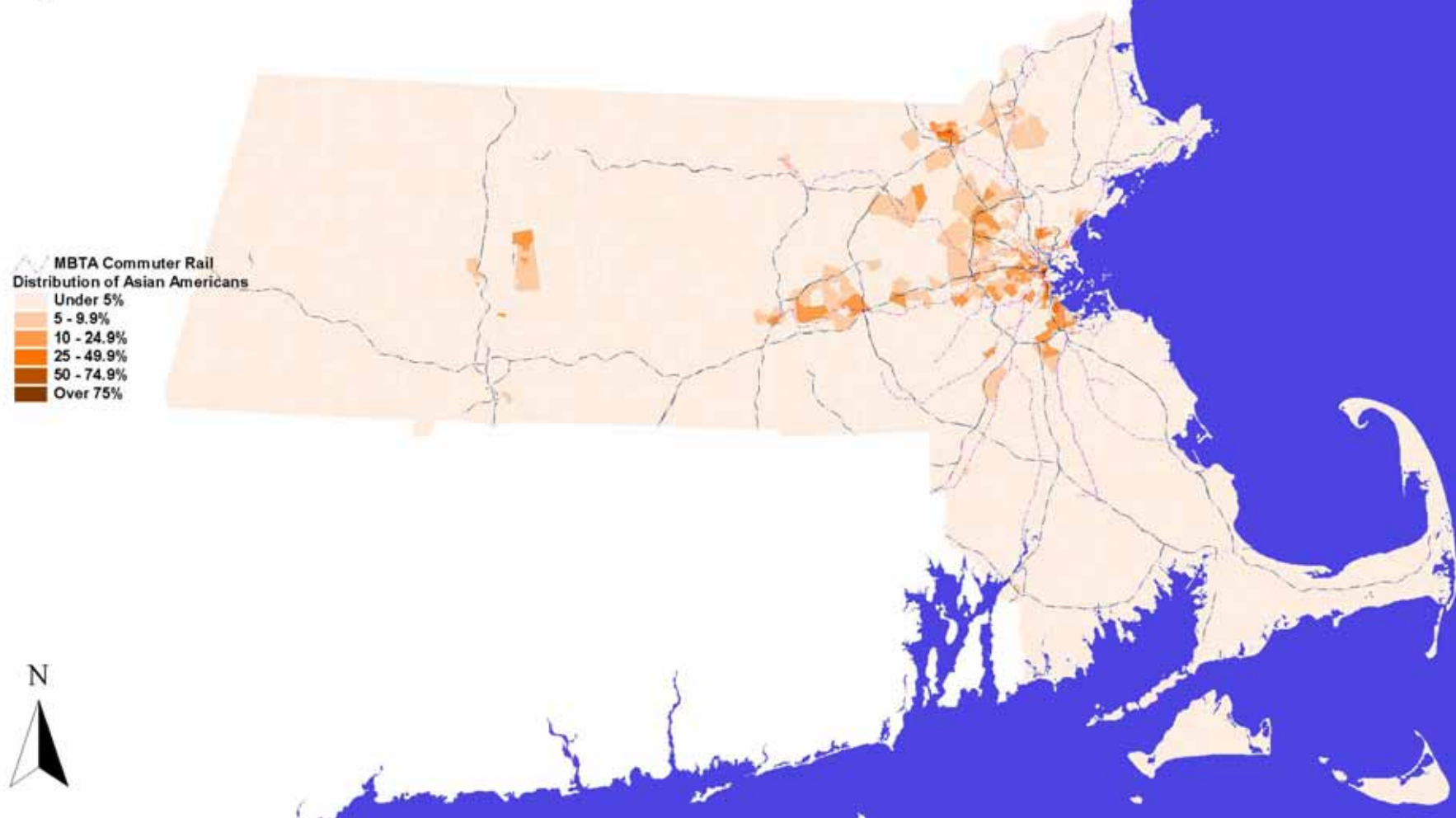


M-6

Distribution of Asian Americans

Commonwealth of Massachusetts

By Census Tract: 2000





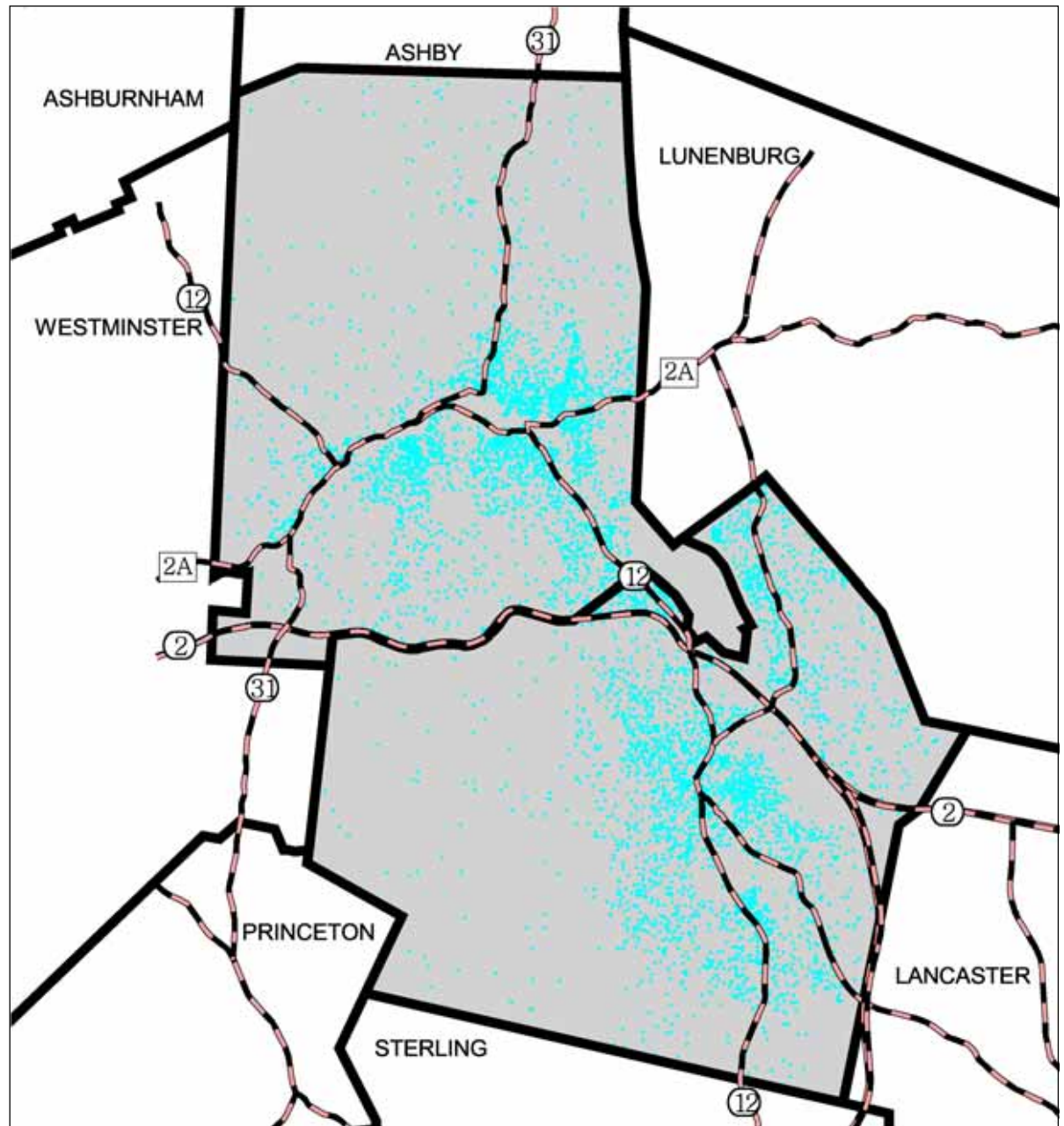
Commonwealth of Massachusetts
Demographic Analysis for
**Fitchburg &
Leominster**
Census 2000



Population Density By Census Block

Fitchburg-Leominster, MA
Census 2000

Each dot = 10 Residents

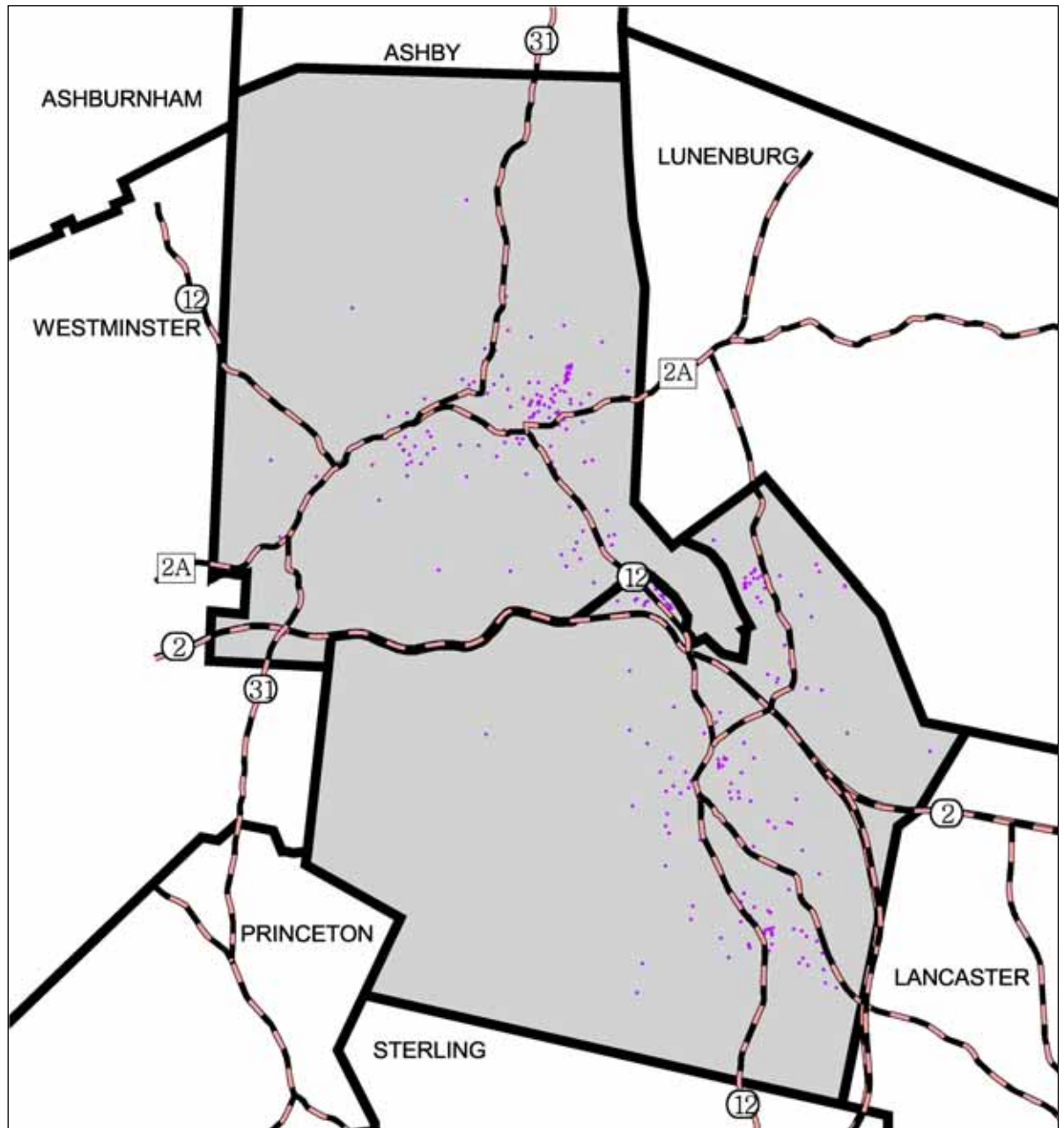


African Americans

By Census Block

Fitchburg-Leominster, MA
Census 2000

Each dot = 5 Blacks

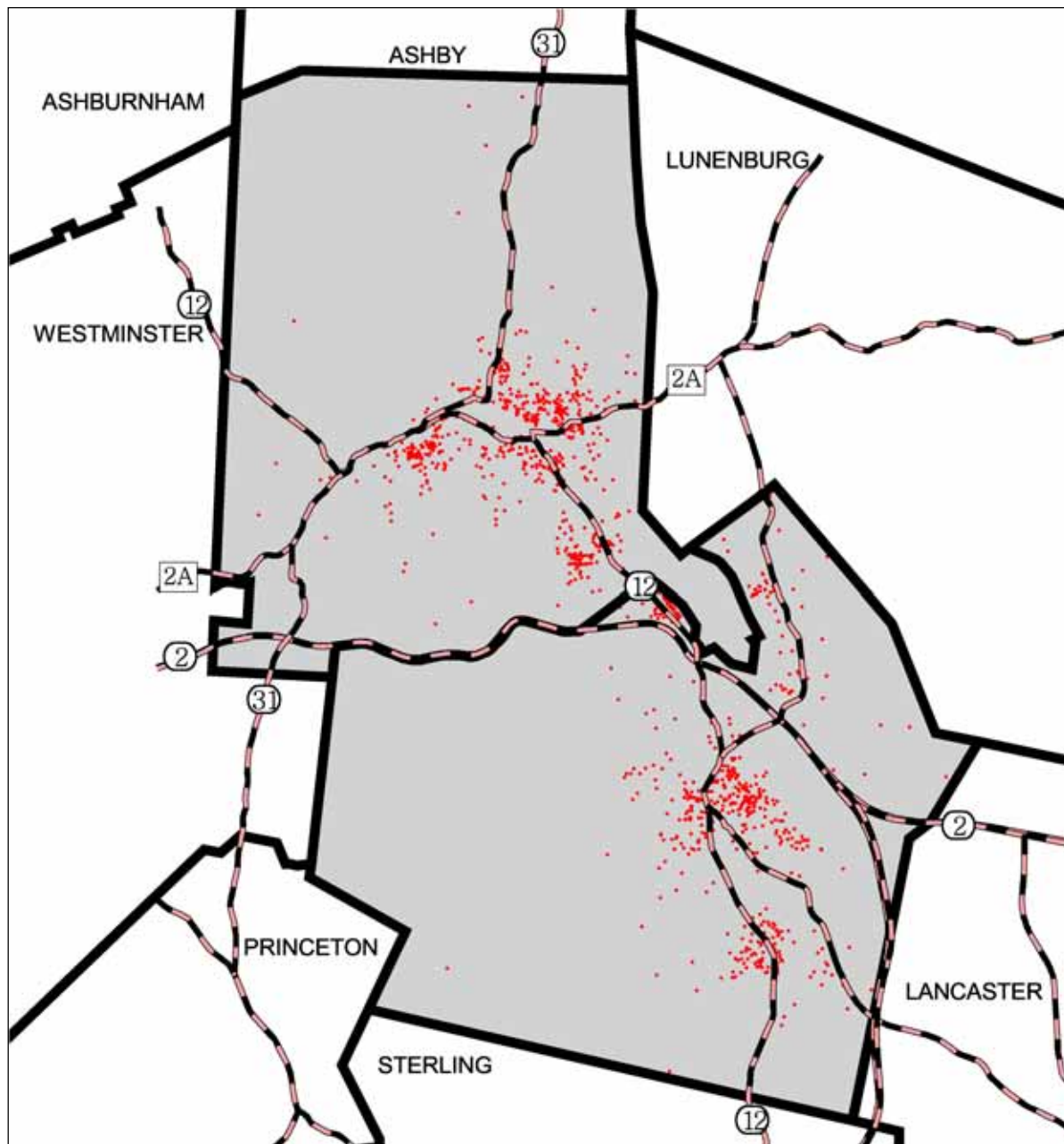


Latinos

By Census Block

Fitchburg-Leominster, MA
Census 2000

Each dot = 5 Latinos

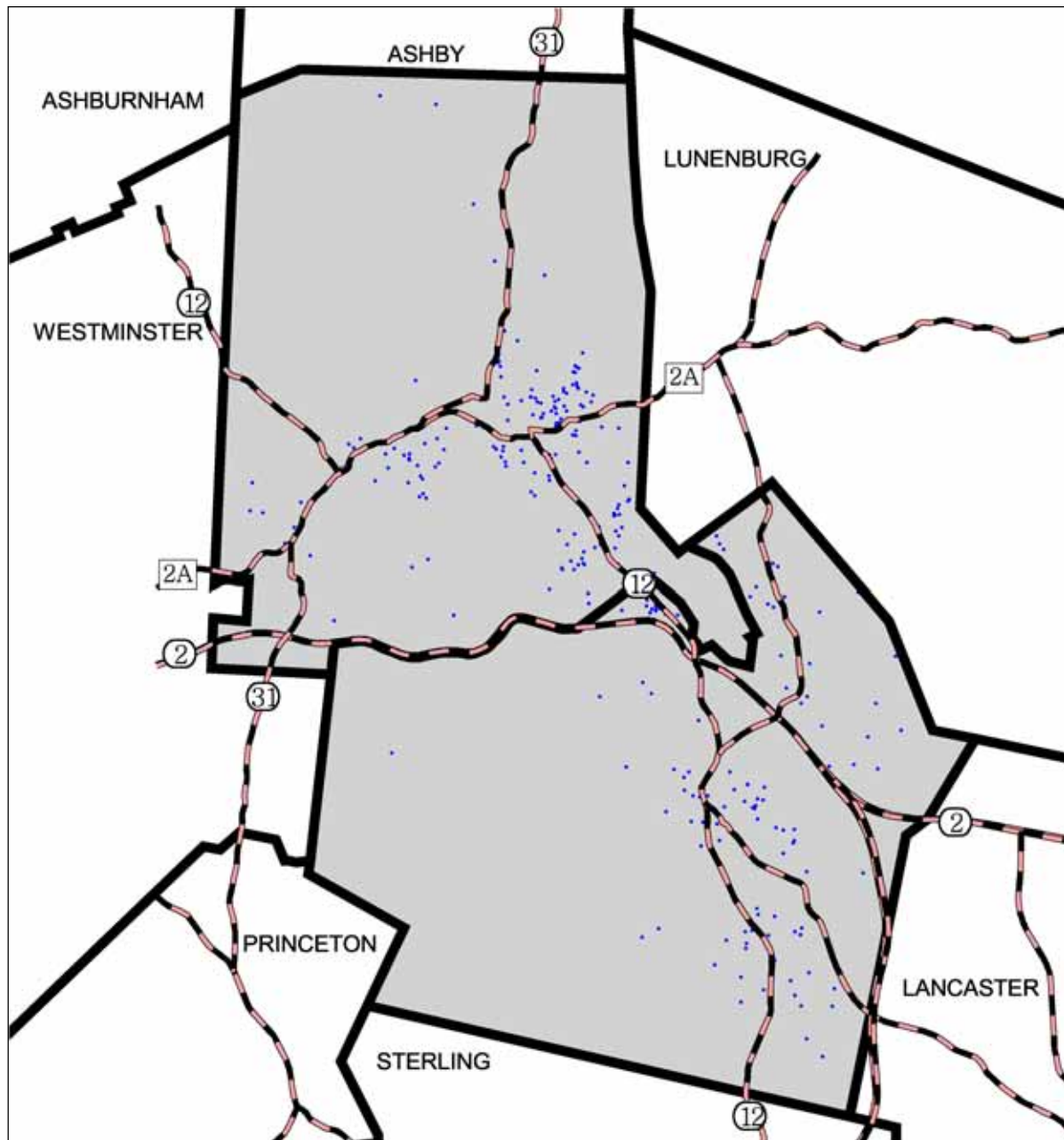


Asian Americans

By Census Block

Fitchburg-Leominster, MA
Census 2000

Each dot = 5 Asians

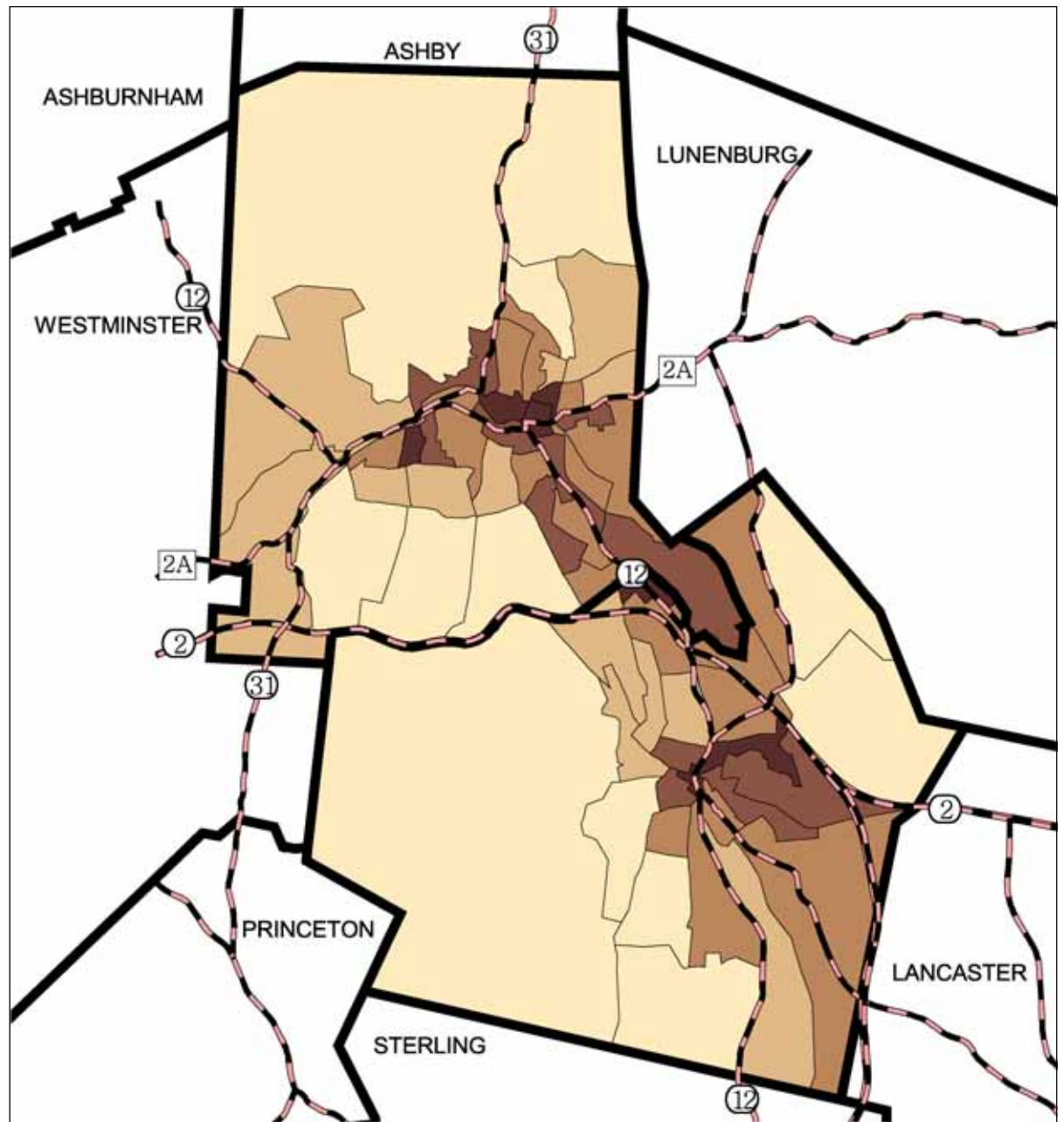
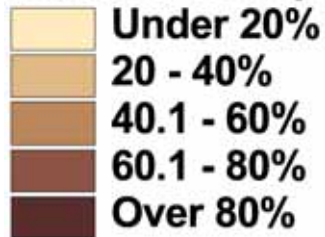


Housing Tenure

By Census Blockgroup

Fitchburg-Leominster, MA
Census 2000

% Renter Occupied

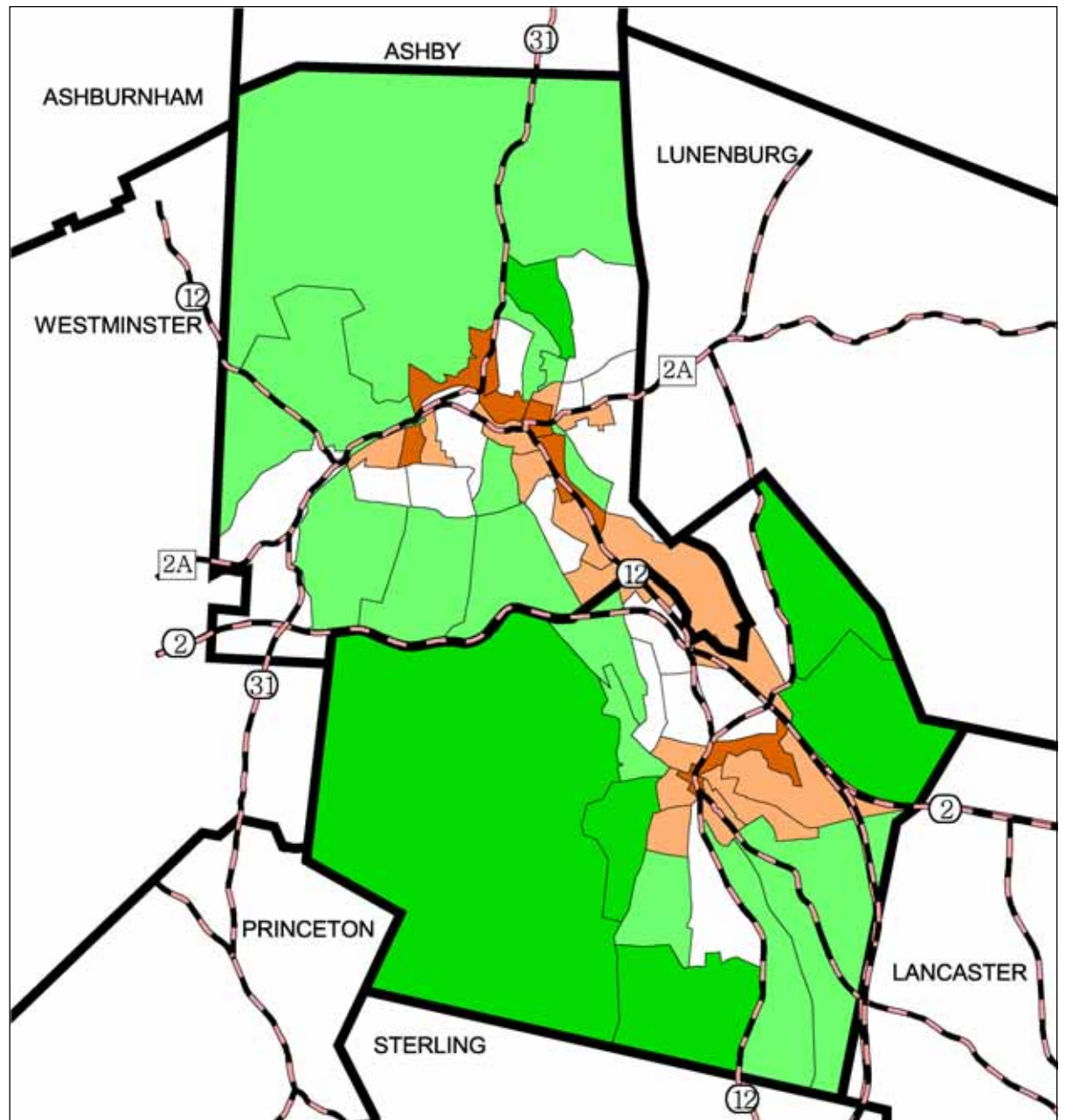


Median Income

By Census Blockgroup

Fitchburg-Leominster, MA
Census 2000

Median Income





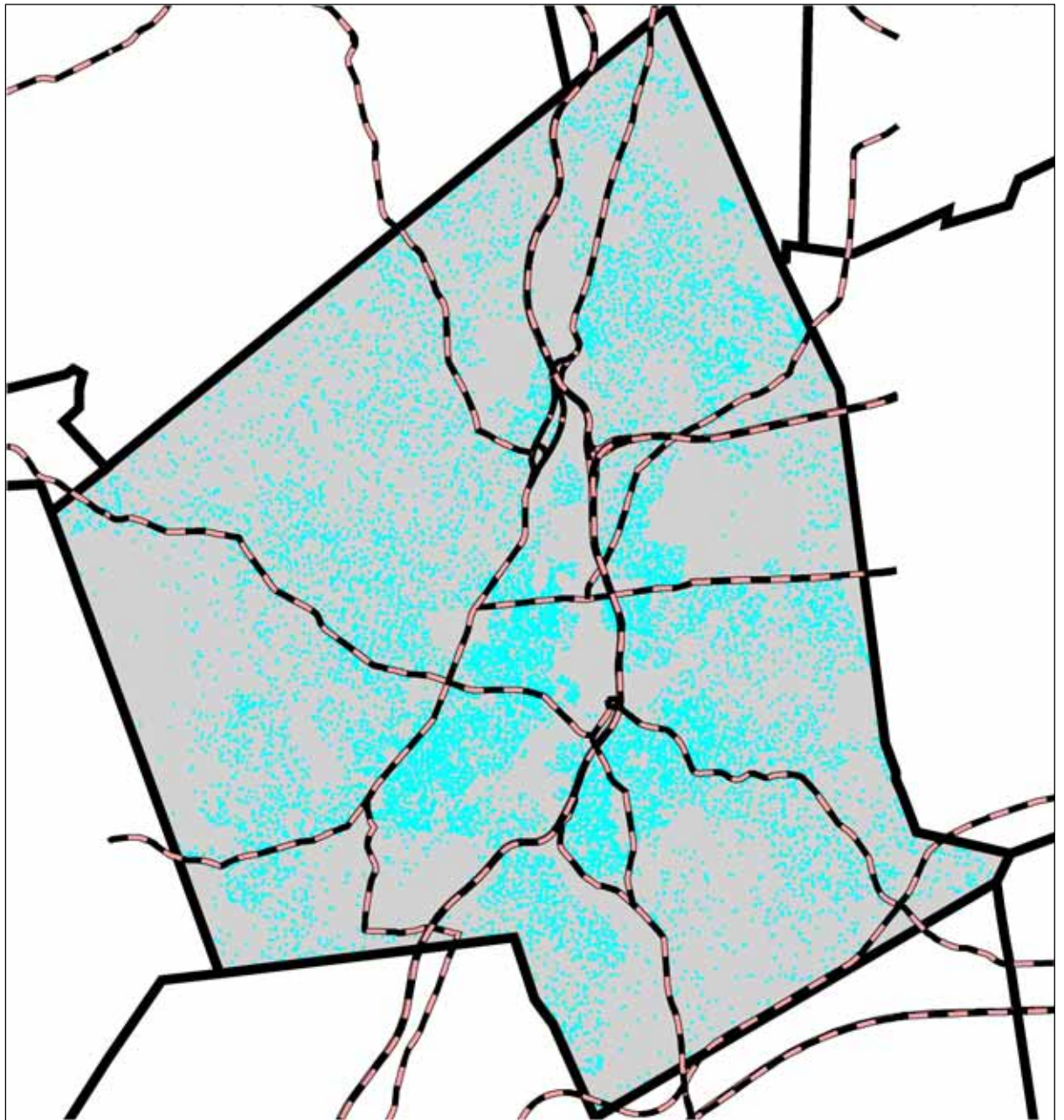
Commonwealth of Massachusetts
Demographic Analysis for
City of
Worcester
Census 2000



Population Density By Census Block

Worcester, MA
Census 2000

Each dot = 10 Residents

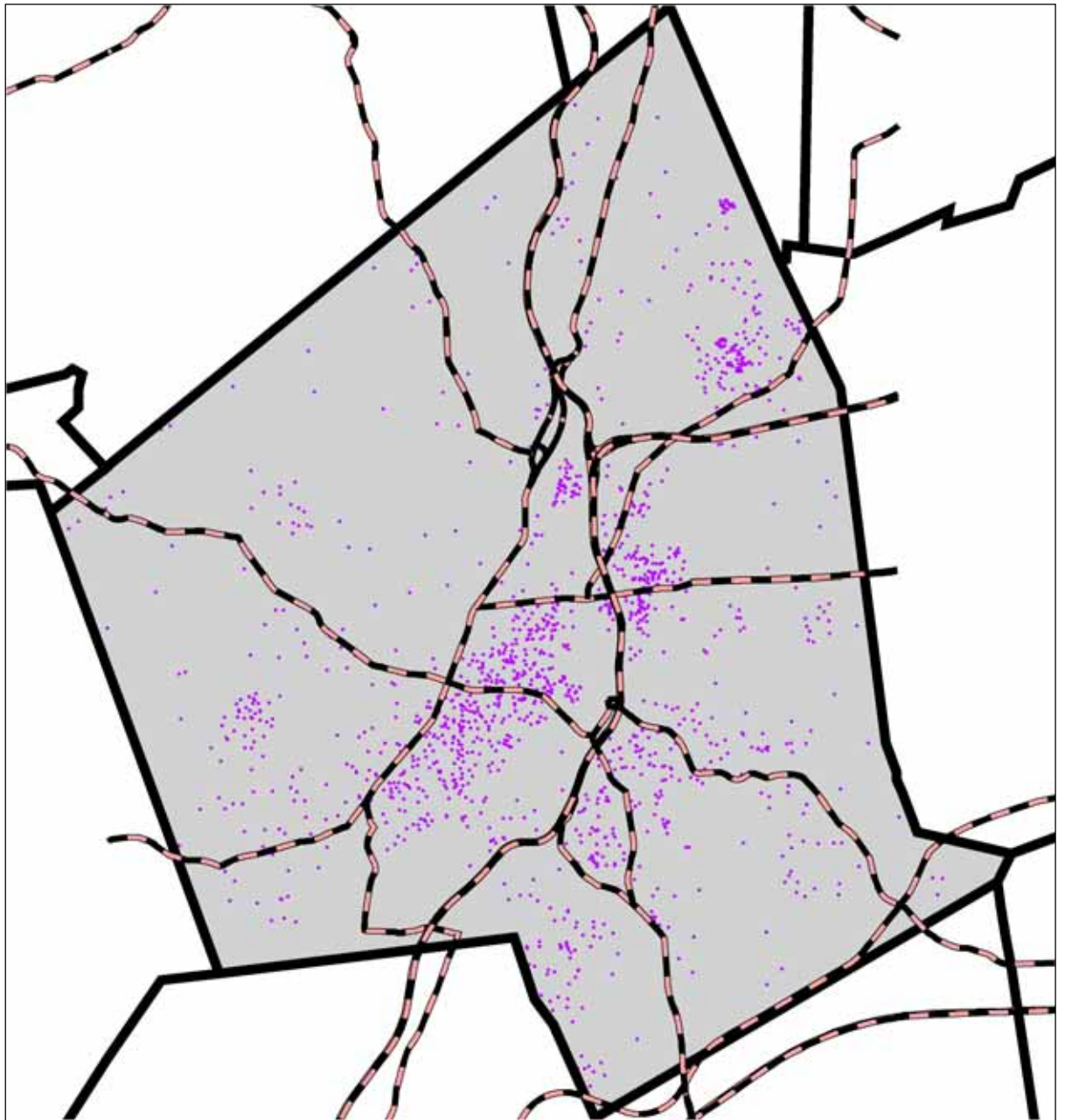


African Americans

By Census Block

Worcester, MA
Census 2000

Each dot = 5 Blacks

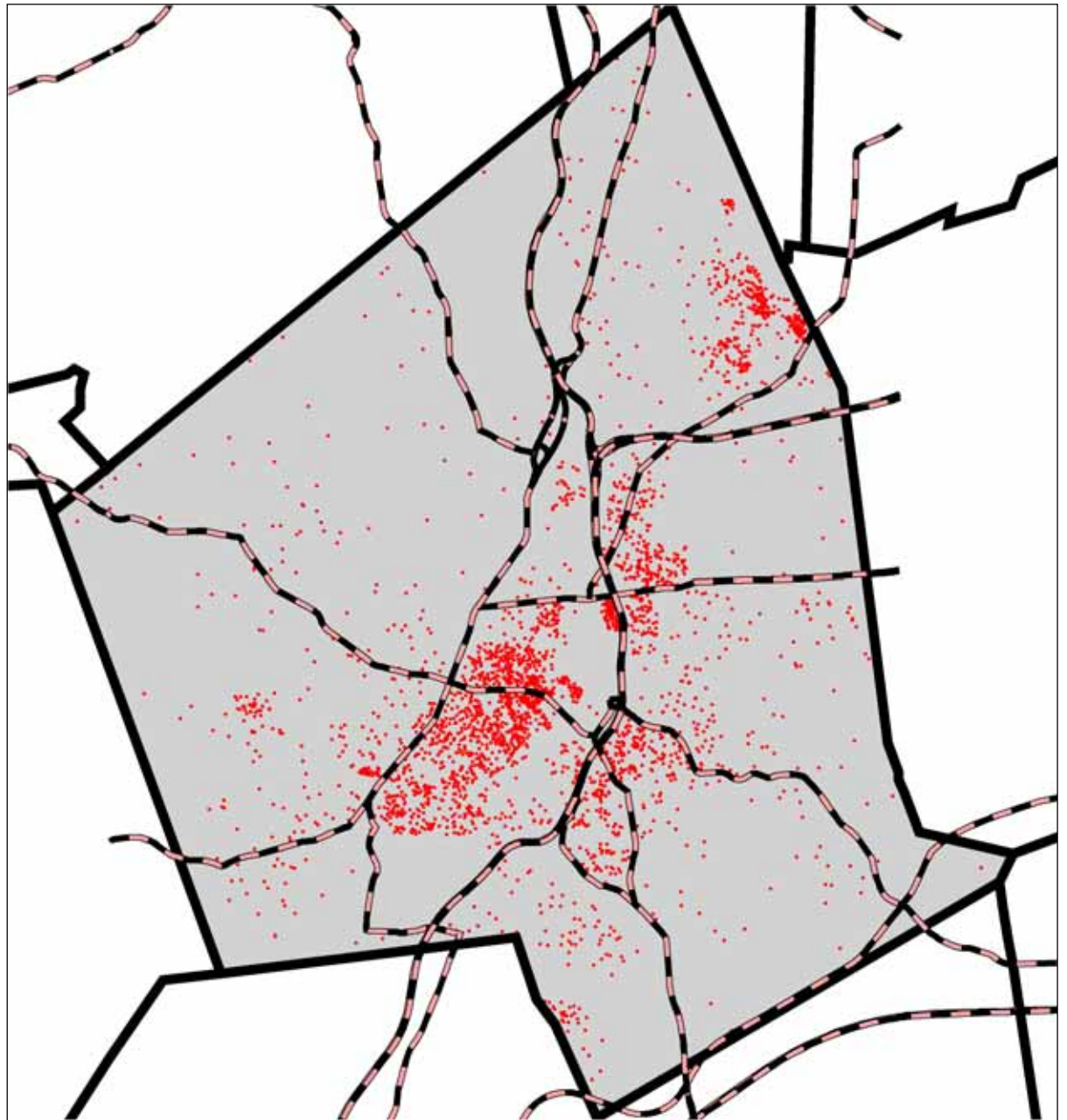


Latinos

By Census Block

Worcester, MA
Census 2000

Each dot = 5 Latinos

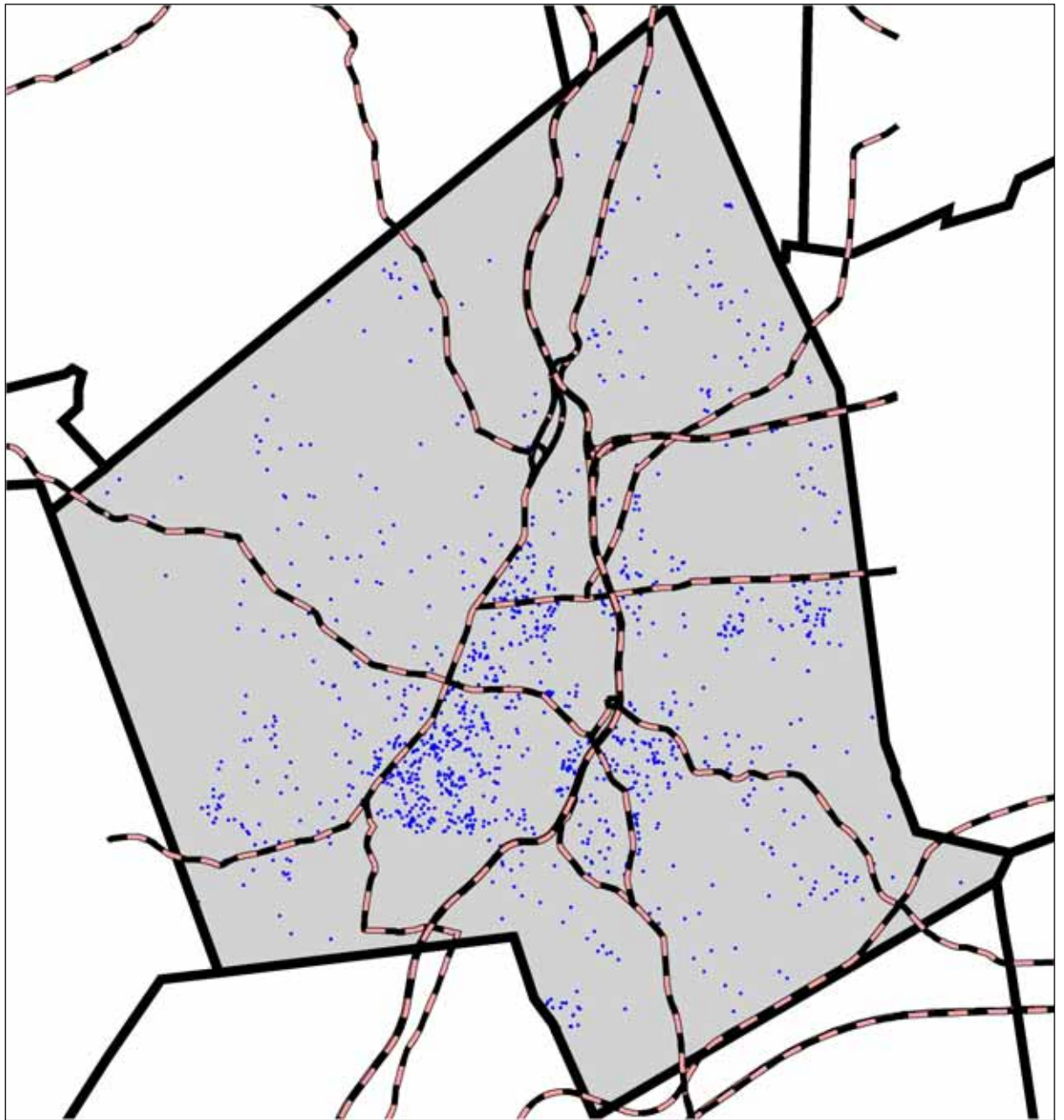


Asian Americans

By Census Block

Worcester, MA
Census 2000

Each dot = 5 Asians

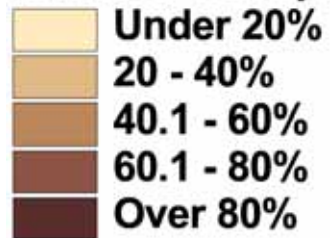


Housing Tenure

By Census Blockgroup

Worcester, MA
Census 2000

% Renter Occupied

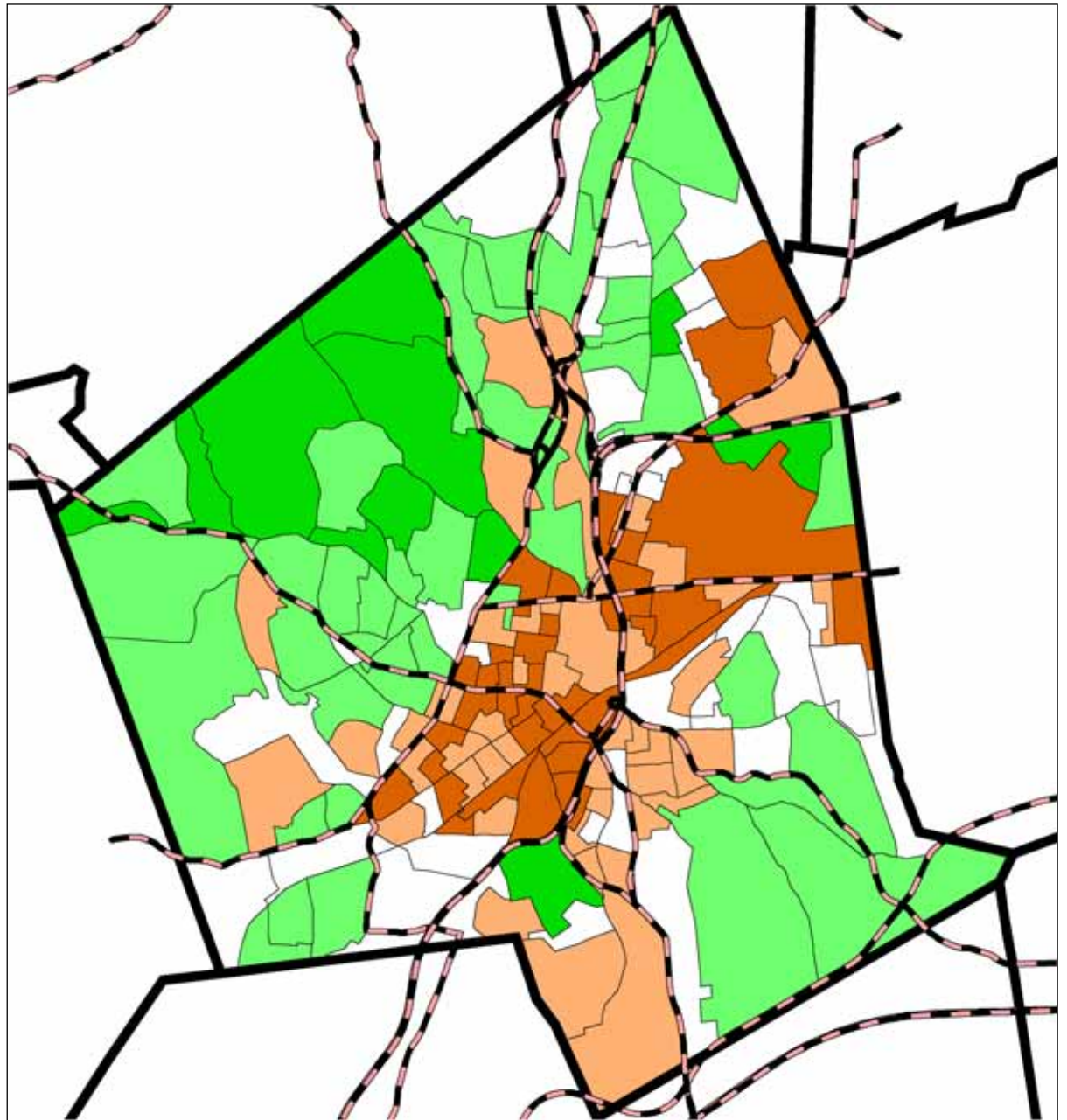


Median Income

By Census Blockgroup

Worcester, MA
Census 2000

Median Income



MCAD Homebuyer Database

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T
1	BUYER1FN	BUYER1LN	BUYER2FN	BUYER2LN	ADDRESS	CITY	ZIP	PRICE	MORT	LENDER	Asian	Black	Hispanic	White	Other	Total	%AsPop	%BIPop	%HispPop	%WhPop
2	Names removed by MCAD.				113 Foster St	Lawrence	01843-2217	85000	82163	1st Horizon Hm Ln	19	9	118	64	1	211	9.0	4.3	55.9	30.3
3	Names removed by MCAD.				37 Eutaw St	Lawrence	01841-1725	125000	141700	Fleet Mortgage	1	0	114	25	0	140	0.7	0.0	81.4	17.9
4	Names removed by MCAD.				90 Salem St	Lawrence	01843-1620	103500	82000	Andover Bank	29	5	140	35	5	214	13.6	2.3	65.4	16.4
5	Names removed by MCAD.				54 Eaton St	Lawrence	01843-1159	157000	157000	BankBoston	0	0	8	2	0	10	0.0	0.0	80.0	20.0
6	Names removed by MCAD.				336 Howard St U:7	Lawrence	01841-2938	130000	123500	Salem Five Mtg Corp	5	19	290	156	5	475	1.1	4.0	61.1	32.8
7	Names removed by MCAD.				49 Eutaw St	Lawrence	01841-1725	99900	94900	Olde Towne Mtg Co Inc	1	0	114	25	0	140	0.7	0.0	81.4	17.9
8	Names removed by MCAD.				24 Juniper St	Lawrence	01841-1618	170000	161500	North American Mtg Co	0	0	134	12	0	146	0.0	0.0	91.8	8.2
9	Names removed by MCAD.				41 Oregon Ave	Lawrence	01841-4918	86520	64890	New Century Mtg Corp	8	5	53	28	1	95	8.4	5.3	55.8	29.5
10	Names removed by MCAD.				3 Nightingale Ct	Lawrence	01841-5112	57000	45000	Interate National Mtg	1	20	332	129	6	488	0.2	4.1	68.0	26.4
11	Names removed by MCAD.				61 Exeter St	Lawrence	01843-2925	130000	106340	Mortgage Trust Group	0	0	24	19	3	46	0.0	0.0	52.2	41.3
12	Names removed by MCAD.				14 Pleasant St	Lawrence	01841-2950	154000	20000	Andover Bank	0	9	125	36	4	174	0.0	5.2	71.8	20.7
13	Names removed by MCAD.				277 High St	Lawrence	01841-2802	132900	131168	PNC Mortgage	8	6	178	67	2	261	3.1	2.3	68.2	25.7
14	Names removed by MCAD.				65 Stearns Ave	Lawrence	01841-1134	175000	0		0	0	82	51	0	133	0.0	0.0	61.7	38.3
15	Names removed by MCAD.				3 Grafton St	Lawrence	01843-2901	126500	94850	Fleet Mortgage	0	5	55	14	0	74	0.0	6.8	74.3	18.9
16	Names removed by MCAD.				151 Berkeley St	Lawrence	01841-1221	205000	194750	Pentucket Five Cents	0	9	229	136	0	374	0.0	2.4	61.2	36.4
17	Names removed by MCAD.				110 Farnham St	Lawrence	01843-1523	115000	115000	Fleet Natl Bk	7	15	125	85	6	238	2.9	6.3	52.5	35.7
18	Names removed by MCAD.				66 Milton St	Lawrence	01841-4561	91800	91049	Crossland Mtg Corp	0	4	74	17	1	96	0.0	4.2	77.1	17.7
19	Names removed by MCAD.				257 Farnham St	Lawrence	01843-1841	144900	130400	Salem Five Mtg Corp	4	6	96	43	0	149	2.7	4.0	64.4	28.9
20	Names removed by MCAD.				18 Hancock St	Lawrence	01841-5021	83000	112530	Bank of America	8	0	215	27	11	261	3.1	0.0	82.4	10.3
21	Names removed by MCAD.				451 High St	Lawrence	01841-2045	112500	106800	Republic Bancorp Mtg	2	13	165	76	4	260	0.8	5.0	63.5	29.2
22	Names removed by MCAD.				26 Hobson St	Lawrence	01841-4940	109900	109900	BankBoston	6	0	76	37	0	119	5.0	0.0	63.9	31.1
23	Names removed by MCAD.				19 Saunders St	Lawrence	01841-2626	144000	144000	Fleet Mortgage	3	0	173	13	5	194	1.5	0.0	89.2	6.7
24	Names removed by MCAD.				14 Dempsey Ct	Lawrence	01841-2506	115000	109250	Mtg Approval Services	0	7	160	16	0	183	0.0	3.8	87.4	8.7
25	Names removed by MCAD.				16 Berkeley St	Lawrence	01841-1933	106000	106000	Vincent Ditommaso Jr	0	0	140	37	1	178	0.0	0.0	78.7	20.8
26	Names removed by MCAD.				66 Foster St	Lawrence	01843-1641	130800	110400	Freemont Inv & Loan	32	0	108	28	0	168	19.0	0.0	64.3	16.7
27	Names removed by MCAD.				464 High St	Lawrence	01841-2034	112000	95200	Mortgage Networks Inc	2	13	165	76	4	260	0.8	5.0	63.5	29.2
28	Names removed by MCAD.				96 Farnham St	Lawrence	01843-1523	125000	125000	Fleet Mortgage	7	15	125	85	6	238	2.9	6.3	52.5	35.7
29	Names removed by MCAD.				6 Jordan St	Lawrence	01841-4719	172000	160699	Mark A Saab	0	0	37	5	6	48	0.0	0.0	77.1	10.4
30	Names removed by MCAD.				108 Bennington St	Lawrence	01841-1143	140000	104925	Fleet Mortgage	0	4	107	26	9	146	0.0	2.7	73.3	17.8
31	Names removed by MCAD.				44 Poplar St	Lawrence	01841-1620	116000	145200	Fleet Mortgage	0	0	158	6	0	164	0.0	0.0	96.3	3.7
32	Names removed by MCAD.				220 Walnut St	Lawrence	01841-1639	150000	142500	Fleet Natl Bk	0	1	179	5	5	190	0.0	0.5	94.2	2.6
33	Names removed by MCAD.				72 Hancock St	Lawrence	01841-5054	66000	51000	Misc Company	0	2	251	11	1	265	0.0	0.8	94.7	4.2
34	Names removed by MCAD.				62 Thorndike St	Lawrence	01841-1849	139900	135700	National City Mtg Co	5	0	103	45	1	154	3.2	0.0	66.9	29.2
35	Names removed by MCAD.				118 High St U:11-A	Lawrence	01841-2923	79900	77500	Bank of America	5	19	290	156	5	475	1.1	4.0	61.1	32.8
36	Names removed by MCAD.				44 Belmont St	Lawrence	01841-2728	135000	135000	Fleet Mortgage	0	0	50	24	0	74	0.0	0.0	67.6	32.4
37	Names removed by MCAD.				12 Allyn Ter	Lawrence	01841-1802	141900	140000	Old Kent Mtg Co	0	7	47	27	1	82	0.0	8.5	57.3	32.9
38	Names removed by MCAD.				18 Fern St	Lawrence	01841-1205	100000	80000	Olde Towne Mtg Co Inc	0	9	229	136	0	374	0.0	2.4	61.2	36.4
39	Names removed by MCAD.				69 Sunset Ave	Lawrence	01841-1138	140000	139900	Citizens Mortgage Cor	1	0	199	41	2	243	0.4	0.0	81.9	16.9
40	Names removed by MCAD.				35 Hampton St	Lawrence	01841-4247	92500	91700	H&R Block Mtg	0	0	77	5	2	84	0.0	0.0	91.7	6.0
41	Names removed by MCAD.				14 Mason St	Lawrence	01841-5123	118000	114050	First Mass Mtg Corp	0	22	245	88	4	359	0.0	6.1	68.2	24.5
42	Names removed by MCAD.				25 Bromfield St	Lawrence	01841-2503	110000	109100	FT Mortgage Companies	0	0	101	7	0	108	0.0	0.0	93.5	6.5
43	Names removed by MCAD.				11 Bunkerhill St	Lawrence	01841-2519	189000	183106	1st Horizon Hm Ln	0	0	75	4	1	80	0.0	0.0	93.8	5.0
44	Names removed by MCAD.				84 Howard St	Lawrence	01841-2307	96000	91200	Cendant Mtg Group	9	4	70	40	4	127	7.1	3.1	55.1	31.5
45	Names removed by MCAD.				90 Lexington St	Lawrence	01841-1716	96553	95757	Crossland Mtg Corp	0	8	84	25	2	119	0.0	6.7	70.6	21.0
46	Names removed by MCAD.				166 Spruce St	Lawrence	01841-1025	180000	173514	Old Kent Mtg Co	0	3	129	19	0	151	0.0	2.0	85.4	12.6
47	Names removed by MCAD.				44 Alder St	Lawrence	01841-2535	112000	89600	First Essex Svgs Bk	0	7	160	16	0	183	0.0	3.8	87.4	8.7
48	Names removed by MCAD.				9 Exchange St	Lawrence	01841-3129	119900	95920	Option One Mtg Corp	0	1	139	9	2	151	0.0	0.7	92.1	6.0
49	Names removed by MCAD.				108 Willow St	Lawrence	01841-2452	1450000	130500	First Eastern Mtg Co	0	1	73	11	0	85	0.0	1.2	85.9	12.9
50	Names removed by MCAD.				17 Willoughby St	Lawrence	01841-3429	137000	109600	First Eastern Mtg Co	0	0	124	11	0	135	0.0	0.0	91.9	8.1
51	Names removed by MCAD.				16 Allyn Ter	Lawrence	01841-1802	140000	133000	Andover Bank	0	7	47	27	1	82	0.0	8.5	57.3	32.9
52	Names removed by MCAD.				24 Ames St	Lawrence	01841-4902	138000	105000	Natl Bks Assn	0	0	17	13	0	30	0.0	0.0	56.7	43.3
53	Names removed by MCAD.				21 Bunkerhill St	Lawrence	01841-2519	77000	76370	Countrywide Home Loan	0	0	75	4	1	80	0.0	0.0	93.8	5.0

MCAD Homebuyer Database

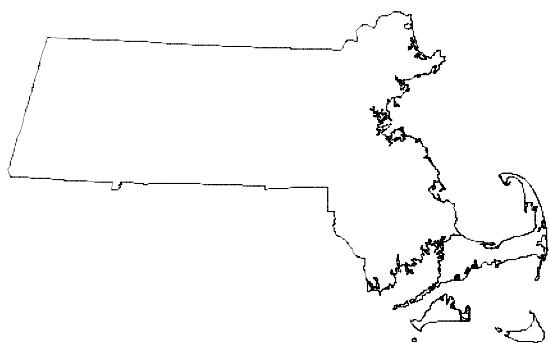
	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF	AG	AH	AI	AJ	AK	AL	AM
1	%OthPop	%chAs	%chBI	%chHisp	%chWh	%chOth	%chTotal	AsHMDA	BIHMDA	HispHMDA	WhHMDA	OthHMDA	UnknHMDA	TotalKnwHMDA	%AsHMDA	%BIHMDA	%HispHMDA	%WhHMDA	%OthHMDA
2	0.5	-51.3	350.0	118.5	-53.3		-9.1	28	4	164	80		9	288	9.7	1.4	56.9	27.8	
3	0.0			25.3	-54.5	-100.0	-4.8	3	11	256	69		12	349	0.9	3.2	73.4	19.8	
4	2.3	31.8	-58.3	35.9	-76.4	150.0	-25.4	28	4	164	80		9	288	9.7	1.4	56.9	27.8	
5	0.0				-85.7		-28.6	26	9	157	146		8	345	7.5	2.6	45.5	42.3	
6	1.1	-16.7	0.0	123.1	-43.1	0.0	9.4	15	20	233	237		18	516	2.9	3.9	45.2	45.9	
7	0.0			25.3	-54.5	-100.0	-4.8	3	11	256	69		12	349	0.9	3.2	73.4	19.8	
8	0.0			-27.6	-25.0		-27.4		3	127	15		3	145		2.1	87.6	10.3	
9	1.1			307.7	-47.2		43.9	8	2	188	89	11	10	298	2.7	0.7	63.1	29.9	3.7
10	1.2	0.0	233.3	41.3	-40.0	100.0	6.1	2	3	66	25		4	96	2.1	3.1	68.8	26.0	
11	6.5	-100.0			-51.3		-4.2	20	3	123	114		8	268	7.5	1.1	45.9	42.5	
12	2.3	-100.0	350.0	363.0	-74.1		1.8	15	20	233	237		18	516	2.9	3.9	45.2	45.9	
13	0.8		-73.9	147.2	-55.6		6.1	15	20	233	237		18	516	2.9	3.9	45.2	45.9	
14	0.0				-42.7		49.4	3	11	256	69		12	349	0.9	3.2	73.4	19.8	
15	0.0		400.0	816.7	-50.0		111.4	20	3	123	114		8	268	7.5	1.1	45.9	42.5	
16	0.0		50.0	133.7	-30.3	-100.0	24.7	3	11	256	69		12	349	0.9	3.2	73.4	19.8	
17	2.5	75.0	0.0	346.4	-51.7		6.7	28	4	164	80		9	288	9.7	1.4	56.9	27.8	
18	1.0	-100.0	33.3	138.7	-56.4		23.1	12	15	217	143	12	16	399	3.0	3.8	54.4	35.8	3.0
19	0.0	-76.5	50.0	118.2	-47.6	-100.0	0.7	28	4	164	80		9	288	9.7	1.4	56.9	27.8	
20	4.2		-100.0	9.7	-22.9	1000.0	7.9	2	3	66	25		4	96	2.1	3.1	68.8	26.0	
21	1.5		1200.0	560.0	-56.6		29.4	15	20	233	237		18	516	2.9	3.9	45.2	45.9	
22	0.0			660.0	-61.5		12.3	8	2	188	89	11	10	298	2.7	0.7	63.1	29.9	3.7
23	2.6	-50.0	-100.0	63.2	-87.5		-11.8	3	9	193	39		5	245	1.2	3.7	78.8	15.9	
24	0.0			-25.9	-46.7		-25.6		3	127	15		3	145		2.1	87.6	10.3	
25	0.6			311.8	-48.6	-66.7	63.3	3	9	193	39		5	245	1.2	3.7	78.8	15.9	
26	0.0	-3.0		14.9	-20.0		3.7	28	4	164	80		9	288	9.7	1.4	56.9	27.8	
27	1.5		1200.0	560.0	-56.6		29.4	15	20	233	237		18	516	2.9	3.9	45.2	45.9	
28	2.5	75.0	0.0	346.4	-51.7		6.7	28	4	164	80		9	288	9.7	1.4	56.9	27.8	
29	12.5		-100.0	23.3	150.0		37.1	2	3	66	25		4	96	2.1	3.1	68.8	26.0	
30	6.2			-3.6	-50.0		-10.4	3	11	256	69		12	349	0.9	3.2	73.4	19.8	
31	0.0		-100.0	-11.7	-33.3		-14.6		3	127	15		3	145		2.1	87.6	10.3	
32	2.6			17.0	-75.0		9.8		3	127	15		3	145		2.1	87.6	10.3	
33	0.4	-100.0	-77.8	-12.2	-35.3		-17.7	2	3	66	25		4	96	2.1	3.1	68.8	26.0	
34	0.6			49.3	-15.1		26.2	3	11	256	69		12	349	0.9	3.2	73.4	19.8	
35	1.1	-16.7	0.0	123.1	-43.1	0.0	9.4	15	20	233	237		18	516	2.9	3.9	45.2	45.9	
36	0.0			163.2	-45.5		17.5	3	9	193	39		5	245	1.2	3.7	78.8	15.9	
37	1.2	-100.0	75.0	2250.0	-59.1		5.1	3	11	256	69		12	349	0.9	3.2	73.4	19.8	
38	0.0		50.0	133.7	-30.3	-100.0	24.7	3	11	256	69		12	349	0.9	3.2	73.4	19.8	
39	0.8	0.0		116.3	-63.1		19.1	3	11	256	69		12	349	0.9	3.2	73.4	19.8	
40	2.4		-100.0	-24.5	-73.7		-38.2	12	15	217	143	12	16	399	3.0	3.8	54.4	35.8	3.0
41	1.1	-100.0	266.7	81.5	-31.3	-42.9	29.6	2	3	66	25		4	96	2.1	3.1	68.8	26.0	
42	0.0	-100.0		-7.3	-58.8	-100.0	-27.5		3	127	15		3	145		2.1	87.6	10.3	
43	1.3			294.7	-90.2		33.3		3	127	15		3	145		2.1	87.6	10.3	
44	3.1			268.4	-59.2		8.5	15	20	233	237		18	516	2.9	3.9	45.2	45.9	
45	1.7		-11.1	90.9	-51.0		14.4	3	11	256	69		12	349	0.9	3.2	73.4	19.8	
46	0.0	-100.0	-72.7	26.5	-51.3	-100.0	-10.7	3	4	127	31	4	6	169	1.8	2.4	75.1	18.3	2.4
47	0.0			-25.9	-46.7		-25.6		3	127	15		3	145		2.1	87.6	10.3	
48	1.3			24.1	-60.9		11.9	3	4	127	31	4	6	169	1.8	2.4	75.1	18.3	2.4
49	0.0		-80.0	-38.1	-67.6		-45.9	3	4	127	31	4	6	169	1.8	2.4	75.1	18.3	2.4
50	0.0		-100.0	44.2	-78.0		-3.6	4	1	65	13		4	84	4.8	1.2	77.4	15.5	
51	1.2	-100.0	75.0	2250.0	-59.1		5.1	3	11	256	69		12	349	0.9	3.2	73.4	19.8	
52	0.0				-35.0		50.0	8	2	188	89	11	10	298	2.7	0.7	63.1	29.9	3.7
53	1.3			294.7	-90.2		33.3		3	127	15		3	145		2.1	87.6	10.3	

MCAD Homebuyer Database

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T
1	BUYER1FN	BUYER1LN	BUYER2FN	BUYER2LN	ADDRESS	CITY	ZIP	PRICE	MORT	LENDER	Asian	Black	Hispanic	White	Other	Total	%AsPop	%BIPop	%HispPop	%WhPop
2	Names removed by MCAD.				113 Foster St	Lawrence	01843-2217	85000	82163	1st Horizon Hm Ln	19	9	118	64	1	211	9.0	4.3	55.9	30.3
3	Names removed by MCAD.				37 Eutaw St	Lawrence	01841-1725	125000	141700	Fleet Mortgage	1	0	114	25	0	140	0.7	0.0	81.4	17.9
4	Names removed by MCAD.				90 Salem St	Lawrence	01843-1620	103500	82000	Andover Bank	29	5	140	35	5	214	13.6	2.3	65.4	16.4
5	Names removed by MCAD.				54 Eaton St	Lawrence	01843-1159	157000	157000	BankBoston	0	0	8	2	0	10	0.0	0.0	80.0	20.0
6	Names removed by MCAD.				336 Howard St U:7	Lawrence	01841-2938	130000	123500	Salem Five Mtg Corp	5	19	290	156	5	475	1.1	4.0	61.1	32.8
7	Names removed by MCAD.				49 Eutaw St	Lawrence	01841-1725	99900	94900	Olde Towne Mtg Co Inc	1	0	114	25	0	140	0.7	0.0	81.4	17.9
8	Names removed by MCAD.				24 Juniper St	Lawrence	01841-1618	170000	161500	North American Mtg Co	0	0	134	12	0	146	0.0	0.0	91.8	8.2
9	Names removed by MCAD.				41 Oregon Ave	Lawrence	01841-4918	86520	64890	New Century Mtg Corp	8	5	53	28	1	95	8.4	5.3	55.8	29.5
10	Names removed by MCAD.				3 Nightingale Ct	Lawrence	01841-5112	57000	45000	Interate National Mtg	1	20	332	129	6	488	0.2	4.1	68.0	26.4
11	Names removed by MCAD.				61 Exeter St	Lawrence	01843-2925	130000	106340	Mortgage Trust Group	0	0	24	19	3	46	0.0	0.0	52.2	41.3
12	Names removed by MCAD.				14 Pleasant St	Lawrence	01841-2950	154000	20000	Andover Bank	0	9	125	36	4	174	0.0	5.2	71.8	20.7
13	Names removed by MCAD.				277 High St	Lawrence	01841-2802	132900	131168	PNC Mortgage	8	6	178	67	2	261	3.1	2.3	68.2	25.7
14	Names removed by MCAD.				65 Stearns Ave	Lawrence	01841-1134	175000	0		0	0	82	51	0	133	0.0	0.0	61.7	38.3
15	Names removed by MCAD.				3 Grafton St	Lawrence	01843-2901	126500	94850	Fleet Mortgage	0	5	55	14	0	74	0.0	6.8	74.3	18.9
16	Names removed by MCAD.				151 Berkeley St	Lawrence	01841-1221	205000	194750	Pentucket Five Cents	0	9	229	136	0	374	0.0	2.4	61.2	36.4
17	Names removed by MCAD.				110 Farnham St	Lawrence	01843-1523	115000	115000	Fleet Natl Bk	7	15	125	85	6	238	2.9	6.3	52.5	35.7
18	Names removed by MCAD.				66 Milton St	Lawrence	01841-4561	91800	91049	Crossland Mtg Corp	0	4	74	17	1	96	0.0	4.2	77.1	17.7
19	Names removed by MCAD.				257 Farnham St	Lawrence	01843-1841	144900	130400	Salem Five Mtg Corp	4	6	96	43	0	149	2.7	4.0	64.4	28.9
20	Names removed by MCAD.				18 Hancock St	Lawrence	01841-5021	83000	112530	Bank of America	8	0	215	27	11	261	3.1	0.0	82.4	10.3
21	Names removed by MCAD.				451 High St	Lawrence	01841-2045	112500	106800	Republic Bancorp Mtg	2	13	165	76	4	260	0.8	5.0	63.5	29.2
22	Names removed by MCAD.				26 Hobson St	Lawrence	01841-4940	109900	109900	BankBoston	6	0	76	37	0	119	5.0	0.0	63.9	31.1
23	Names removed by MCAD.				19 Saunders St	Lawrence	01841-2626	144000	144000	Fleet Mortgage	3	0	173	13	5	194	1.5	0.0	89.2	6.7
24	Names removed by MCAD.				14 Dempsey Ct	Lawrence	01841-2506	115000	109250	Mtg Approval Services	0	7	160	16	0	183	0.0	3.8	87.4	8.7
25	Names removed by MCAD.				16 Berkeley St	Lawrence	01841-1933	106000	106000	Vincent Ditommaso Jr	0	0	140	37	1	178	0.0	0.0	78.7	20.8
26	Names removed by MCAD.				66 Foster St	Lawrence	01843-1641	130800	110400	Freemont Inv & Loan	32	0	108	28	0	168	19.0	0.0	64.3	16.7
27	Names removed by MCAD.				464 High St	Lawrence	01841-2034	112000	95200	Mortgage Networks Inc	2	13	165	76	4	260	0.8	5.0	63.5	29.2
28	Names removed by MCAD.				96 Farnham St	Lawrence	01843-1523	125000	125000	Fleet Mortgage	7	15	125	85	6	238	2.9	6.3	52.5	35.7
29	Names removed by MCAD.				6 Jordan St	Lawrence	01841-4719	172000	160699	Mark A Saab	0	0	37	5	6	48	0.0	0.0	77.1	10.4
30	Names removed by MCAD.				108 Bennington St	Lawrence	01841-1143	140000	104925	Fleet Mortgage	0	4	107	26	9	146	0.0	2.7	73.3	17.8
31	Names removed by MCAD.				44 Poplar St	Lawrence	01841-1620	116000	145200	Fleet Mortgage	0	0	158	6	0	164	0.0	0.0	96.3	3.7
32	Names removed by MCAD.				220 Walnut St	Lawrence	01841-1639	150000	142500	Fleet Natl Bk	0	1	179	5	5	190	0.0	0.5	94.2	2.6
33	Names removed by MCAD.				72 Hancock St	Lawrence	01841-5054	66000	51000	Misc Company	0	2	251	11	1	265	0.0	0.8	94.7	4.2
34	Names removed by MCAD.				62 Thorndike St	Lawrence	01841-1849	139900	135700	National City Mtg Co	5	0	103	45	1	154	3.2	0.0	66.9	29.2
35	Names removed by MCAD.				118 High St U:11-A	Lawrence	01841-2923	79900	77500	Bank of America	5	19	290	156	5	475	1.1	4.0	61.1	32.8
36	Names removed by MCAD.				44 Belmont St	Lawrence	01841-2728	135000	135000	Fleet Mortgage	0	0	50	24	0	74	0.0	0.0	67.6	32.4
37	Names removed by MCAD.				12 Allyn Ter	Lawrence	01841-1802	141900	140000	Old Kent Mtg Co	0	7	47	27	1	82	0.0	8.5	57.3	32.9
38	Names removed by MCAD.				18 Fern St	Lawrence	01841-1205	100000	80000	Olde Towne Mtg Co Inc	0	9	229	136	0	374	0.0	2.4	61.2	36.4
39	Names removed by MCAD.				69 Sunset Ave	Lawrence	01841-1138	140000	139900	Citizens Mortgage Cor	1	0	199	41	2	243	0.4	0.0	81.9	16.9
40	Names removed by MCAD.				35 Hampton St	Lawrence	01841-4247	92500	91700	H&R Block Mtg	0	0	77	5	2	84	0.0	0.0	91.7	6.0
41	Names removed by MCAD.				14 Mason St	Lawrence	01841-5123	118000	114050	First Mass Mtg Corp	0	22	245	88	4	359	0.0	6.1	68.2	24.5
42	Names removed by MCAD.				25 Bromfield St	Lawrence	01841-2503	110000	109100	FT Mortgage Companies	0	0	101	7	0	108	0.0	0.0	93.5	6.5
43	Names removed by MCAD.				11 Bunkerhill St	Lawrence	01841-2519	189000	183106	1st Horizon Hm Ln	0	0	75	4	1	80	0.0	0.0	93.8	5.0
44	Names removed by MCAD.				84 Howard St	Lawrence	01841-2307	96000	91200	Cendant Mtg Group	9	4	70	40	4	127	7.1	3.1	55.1	31.5
45	Names removed by MCAD.				90 Lexington St	Lawrence	01841-1716	96553	95757	Crossland Mtg Corp	0	8	84	25	2	119	0.0	6.7	70.6	21.0
46	Names removed by MCAD.				166 Spruce St	Lawrence	01841-1025	180000	173514	Old Kent Mtg Co	0	3	129	19	0	151	0.0	2.0	85.4	12.6
47	Names removed by MCAD.				44 Alder St	Lawrence	01841-2535	112000	89600	First Essex Svgs Bk	0	7	160	16	0	183	0.0	3.8	87.4	8.7
48	Names removed by MCAD.				9 Exchange St	Lawrence	01841-3129	119900	95920	Option One Mtg Corp	0	1	139	9	2	151	0.0	0.7	92.1	6.0
49	Names removed by MCAD.				108 Willow St	Lawrence	01841-2452	1450000	130500	First Eastern Mtg Co	0	1	73	11	0	85	0.0	1.2	85.9	12.9
50	Names removed by MCAD.				17 Willoughby St	Lawrence	01841-3429	137000	109600	First Eastern Mtg Co	0	0	124	11	0	135	0.0	0.0	91.9	8.1
51	Names removed by MCAD.				16 Allyn Ter	Lawrence	01841-1802	140000	133000	Andover Bank	0	7	47	27	1	82	0.0	8.5	57.3	32.9
52	Names removed by MCAD.				24 Ames St	Lawrence	01841-4902	138000	105000	Natl Bks Assn	0	0	17	13	0	30	0.0	0.0	56.7	43.3
53	Names removed by MCAD.				21 Bunkerhill St	Lawrence	01841-2519	77000	76370	Countrywide Home Loan	0	0	75	4	1	80	0.0	0.0	93.8	5.0

MCAD Homebuyer Database

	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF	AG	AH	AI	AJ	AK	AL	AM
1	%OthPop	%chAs	%chBI	%chHisp	%chWh	%chOth	%chTotal	AsHMDA	BIHMDA	HispHMDA	WhHMDA	OthHMDA	UnknHMDA	TotalKnwHMDA	%AsHMDA	%BIHMDA	%HispHMDA	%WhHMDA	%OthHMDA
2	0.5	-51.3	350.0	118.5	-53.3		-9.1	28	4	164	80		9	288	9.7	1.4	56.9	27.8	
3	0.0			25.3	-54.5	-100.0	-4.8	3	11	256	69		12	349	0.9	3.2	73.4	19.8	
4	2.3	31.8	-58.3	35.9	-76.4	150.0	-25.4	28	4	164	80		9	288	9.7	1.4	56.9	27.8	
5	0.0				-85.7		-28.6	26	9	157	146		8	345	7.5	2.6	45.5	42.3	
6	1.1	-16.7	0.0	123.1	-43.1	0.0	9.4	15	20	233	237		18	516	2.9	3.9	45.2	45.9	
7	0.0			25.3	-54.5	-100.0	-4.8	3	11	256	69		12	349	0.9	3.2	73.4	19.8	
8	0.0			-27.6	-25.0		-27.4		3	127	15		3	145		2.1	87.6	10.3	
9	1.1			307.7	-47.2		43.9	8	2	188	89	11	10	298	2.7	0.7	63.1	29.9	3.7
10	1.2	0.0	233.3	41.3	-40.0	100.0	6.1	2	3	66	25		4	96	2.1	3.1	68.8	26.0	
11	6.5	-100.0			-51.3		-4.2	20	3	123	114		8	268	7.5	1.1	45.9	42.5	
12	2.3	-100.0	350.0	363.0	-74.1		1.8	15	20	233	237		18	516	2.9	3.9	45.2	45.9	
13	0.8		-73.9	147.2	-55.6		6.1	15	20	233	237		18	516	2.9	3.9	45.2	45.9	
14	0.0				-42.7		49.4	3	11	256	69		12	349	0.9	3.2	73.4	19.8	
15	0.0		400.0	816.7	-50.0		111.4	20	3	123	114		8	268	7.5	1.1	45.9	42.5	
16	0.0		50.0	133.7	-30.3	-100.0	24.7	3	11	256	69		12	349	0.9	3.2	73.4	19.8	
17	2.5	75.0	0.0	346.4	-51.7		6.7	28	4	164	80		9	288	9.7	1.4	56.9	27.8	
18	1.0	-100.0	33.3	138.7	-56.4		23.1	12	15	217	143	12	16	399	3.0	3.8	54.4	35.8	3.0
19	0.0	-76.5	50.0	118.2	-47.6	-100.0	0.7	28	4	164	80		9	288	9.7	1.4	56.9	27.8	
20	4.2		-100.0	9.7	-22.9	1000.0	7.9	2	3	66	25		4	96	2.1	3.1	68.8	26.0	
21	1.5		1200.0	560.0	-56.6		29.4	15	20	233	237		18	516	2.9	3.9	45.2	45.9	
22	0.0			660.0	-61.5		12.3	8	2	188	89	11	10	298	2.7	0.7	63.1	29.9	3.7
23	2.6	-50.0	-100.0	63.2	-87.5		-11.8	3	9	193	39		5	245	1.2	3.7	78.8	15.9	
24	0.0			-25.9	-46.7		-25.6		3	127	15		3	145		2.1	87.6	10.3	
25	0.6			311.8	-48.6	-66.7	63.3	3	9	193	39		5	245	1.2	3.7	78.8	15.9	
26	0.0	-3.0		14.9	-20.0		3.7	28	4	164	80		9	288	9.7	1.4	56.9	27.8	
27	1.5		1200.0	560.0	-56.6		29.4	15	20	233	237		18	516	2.9	3.9	45.2	45.9	
28	2.5	75.0	0.0	346.4	-51.7		6.7	28	4	164	80		9	288	9.7	1.4	56.9	27.8	
29	12.5		-100.0	23.3	150.0		37.1	2	3	66	25		4	96	2.1	3.1	68.8	26.0	
30	6.2			-3.6	-50.0		-10.4	3	11	256	69		12	349	0.9	3.2	73.4	19.8	
31	0.0		-100.0	-11.7	-33.3		-14.6		3	127	15		3	145		2.1	87.6	10.3	
32	2.6			17.0	-75.0		9.8		3	127	15		3	145		2.1	87.6	10.3	
33	0.4	-100.0	-77.8	-12.2	-35.3		-17.7	2	3	66	25		4	96	2.1	3.1	68.8	26.0	
34	0.6			49.3	-15.1		26.2	3	11	256	69		12	349	0.9	3.2	73.4	19.8	
35	1.1	-16.7	0.0	123.1	-43.1	0.0	9.4	15	20	233	237		18	516	2.9	3.9	45.2	45.9	
36	0.0			163.2	-45.5		17.5	3	9	193	39		5	245	1.2	3.7	78.8	15.9	
37	1.2	-100.0	75.0	2250.0	-59.1		5.1	3	11	256	69		12	349	0.9	3.2	73.4	19.8	
38	0.0		50.0	133.7	-30.3	-100.0	24.7	3	11	256	69		12	349	0.9	3.2	73.4	19.8	
39	0.8	0.0		116.3	-63.1		19.1	3	11	256	69		12	349	0.9	3.2	73.4	19.8	
40	2.4		-100.0	-24.5	-73.7		-38.2	12	15	217	143	12	16	399	3.0	3.8	54.4	35.8	3.0
41	1.1	-100.0	266.7	81.5	-31.3	-42.9	29.6	2	3	66	25		4	96	2.1	3.1	68.8	26.0	
42	0.0	-100.0		-7.3	-58.8	-100.0	-27.5		3	127	15		3	145		2.1	87.6	10.3	
43	1.3			294.7	-90.2		33.3		3	127	15		3	145		2.1	87.6	10.3	
44	3.1			268.4	-59.2		8.5	15	20	233	237		18	516	2.9	3.9	45.2	45.9	
45	1.7		-11.1	90.9	-51.0		14.4	3	11	256	69		12	349	0.9	3.2	73.4	19.8	
46	0.0	-100.0	-72.7	26.5	-51.3	-100.0	-10.7	3	4	127	31	4	6	169	1.8	2.4	75.1	18.3	2.4
47	0.0			-25.9	-46.7		-25.6		3	127	15		3	145		2.1	87.6	10.3	
48	1.3			24.1	-60.9		11.9	3	4	127	31	4	6	169	1.8	2.4	75.1	18.3	2.4
49	0.0		-80.0	-38.1	-67.6		-45.9	3	4	127	31	4	6	169	1.8	2.4	75.1	18.3	2.4
50	0.0		-100.0	44.2	-78.0		-3.6	4	1	65	13		4	84	4.8	1.2	77.4	15.5	
51	1.2	-100.0	75.0	2250.0	-59.1		5.1	3	11	256	69		12	349	0.9	3.2	73.4	19.8	
52	0.0				-35.0		50.0	8	2	188	89	11	10	298	2.7	0.7	63.1	29.9	3.7
53	1.3			294.7	-90.2		33.3		3	127	15		3	145		2.1	87.6	10.3	



*Massachusetts
Commission
Against
Discrimination*

2001-2002

Commonwealth Homebuyer Survey



1) Administrative Codes

2) Interview ID #:

3) Date:

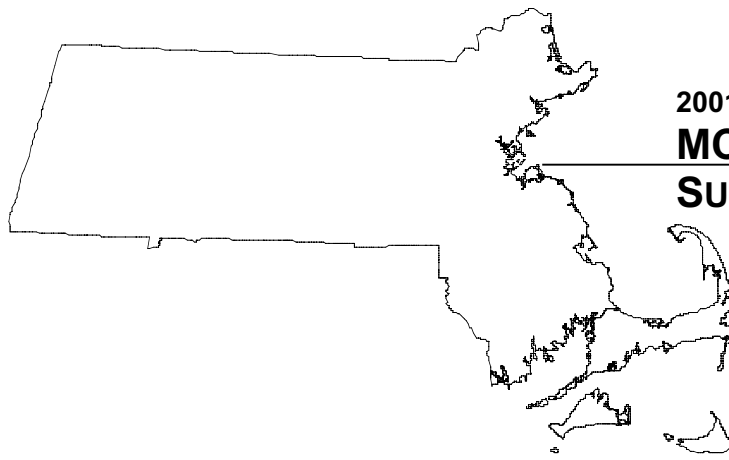
4) Time interview began:

5) Location of interview (address):

6) Where did you live immediately before you moved here?

a) Address:

b) Name of neighborhood



2001-2002
**MCAD COMMONWEALTH
SURVEY**

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Section I: Previous Home and Neighborhood

The first few questions I would like to ask you are about where you lived before you moved here. Please describe your previous home and neighborhood and what you liked or disliked about them.





7) What was the geographic relation to your current home?

- Same neighborhood _____[1]
- Same zip code _____[2]
- Same city/town, different neighborhood _____[3]
- Other place/same metropolitan area _____[4]
- Outside metropolitan area, this state _____[5]
- Outside this state _____[6]
- No previous home _____[7]

8) In which type of housing did you live?

- Single family _____[1]
- Condominium _____[2]
- 2-family/duplex _____[3]
- Triple-decker or 4 unit apartment _____[4]
- Large apartment complex (Units _____) _____[5]
- Other (Type: _____) _____[6]

9) What did you like about your previous home and neighborhood? Why?
What didn't you like? Why?

(Ask for any other reasons. These should be spontaneous and only list them if they don't volunteer information)

- Your unit _____
- Lack of space _____
- Location/Neighborhood _____
- Public School System _____
- Public Safety _____
- Access to Public Transportation _____
- Proximity to Work _____
- Parks/Greenspace _____
- Proximity to Friends, Family, Community _____
- Architecture _____



10) How many rooms did you have in your previous home?

of bedrooms _____

Living Room _____

of bathrooms _____

Dining Room _____

Kitchen _____

Other rooms _____

Back Yard _____

11) Did you own or rent?

Own _____[1]

Rent _____[2]

12) If rent, have you ever owned a home before?

If yes, address and when owned:

13) How would you describe your previous neighborhood? (Probe about ethnic diversity)

a) How did you feel about its ethnic diversity?



Section II: Impetus for Relocation

Now I would like to ask you some questions about why you decided to move from your previous home. Can you tell me about what lead to you decision?





14) When did you first think of moving? (Try to get month and year)

(If respondent cannot state month and year then give them the list of choices below)

- | | |
|--------------------------------------|-------|
| < 6 months from the time of the move | _____ |
| 6-9 months | _____ |
| 9-12 months | _____ |
| 12-18 months | _____ |
| 18-24 months | _____ |
| More than 2 years | _____ |

15) Why did you decide it was time to move?

- | | | |
|---|-------|------|
| Educational opportunities | _____ | [1] |
| Economic opportunities/access to jobs | _____ | [2] |
| Proximity to public transportation | _____ | [3] |
| Architecture | _____ | [4] |
| Crime | _____ | [5] |
| Shopping | _____ | [6] |
| Parks and open space | _____ | [7] |
| Proximity to friends, family, community | _____ | [8] |
| Investment opportunity | _____ | [9] |
| Family size | _____ | [10] |
| Retired | _____ | [11] |
| Lost lease | _____ | [12] |
| Other (Reason:_____) | _____ | [13] |

16) When you decided to move, did you only think about buying a home, or did you consider renting? Why?



END OF SECTION



Section III: Housing Preferences

The next questions I will ask are about your housing preferences. Think back to that time so that we can understand what you were looking for. What did you have in mind before you started your housing search?





17) What type of home were you looking for? (Can answer more than one)

Single family	_____	[1]
Condominium	_____	[2]
2-family/duplex	_____	[3]
Triple-decker or 4 unit apartment	_____	[4]
Large apartment complex	_____	[5]
Other (Type: _____)	_____	[6]

a) Why?

18) Where did you want to live?

(Answer should be either the name of a neighborhood, town, or within a certain set of boundaries; if a neighborhood name is given probe for street boundaries)

19) Why did you want to live there?

(Ask "why?" more than once, ask for explanations of statements)



20) Did you ever **consider living in, search for housing in or look at actual homes in** (NAME OF ADJACENT TOWNS/NEIGHBORHOOD)?

a) T/N #1 Name: _____

Considered living in?	Yes[1]	No[2]
Searched for housing?	Yes[1]	No[2]
Looked at actual homes?	Yes[1]	No[2]

If no, why not?

b) T/N #2 Name: _____

Considered living in?	Yes[1]	No[2]
Searched for housing?	Yes[1]	No[2]
Looked at actual homes?	Yes[1]	No[2]

If no, why not?

c) T/N #3 Name: _____

Considered living in?	Yes[1]	No[2]
Searched for housing?	Yes[1]	No[2]
Looked at actual homes?	Yes[1]	No[2]

If no, why not?

d) T/N #4 Name: _____

Considered living in?	Yes[1]	No[2]
Searched for housing?	Yes[1]	No[2]
Looked at actual homes?	Yes[1]	No[2]

If no, why not?



Section IV: Housing Search

Now I would like to ask you about the search process itself. In your own words please describe how you went about looking for a home. I would like to know how long it took, how many homes you looked at, where you looked, who helped you to identify homes, and how you finally came to find this home.





21) What was the first step in your housing search?

22) Where did you find information about housing? (List only if initial response is short)

Family	_____	[1]
Friends	_____	[2]
Broker/agent	_____	[3]
Newspaper/other publication	_____	[4]
Co-workers	_____	[5]
Web/Internet	_____	[6]
Other (Source:_____)	_____	[7]

23) Did you attend any homebuying education courses?

Yes	_____	[1]
No	_____	[2]

a) Why or why not?

b) If yes, run by whom?

c) How helpful did you find it?

Very helpful	_____	[1]
Somewhat helpful	_____	[2]
Neutral	_____	[3]
Somewhat unhelpful	_____	[4]
Very unhelpful	_____	[5]

d) What was useful about it? Why was it useful? What did you learn? Did you follow their instructions in your homebuying process?



24) Did you use a broker or agent in finding your home?

Yes _____[1]

No _____[2]

If yes, what was the name and company of the broker/agent? If no, skip to #30.

25) How did you find this broker/agent?

Family _____[1]

Friends _____[2]

Other referrals _____[3]

Newspaper/other publication _____[4]

Co-workers _____[5]

Web/Internet _____[6]

Other (Source: _____) _____[7]

26) What did you tell the broker you were looking for?

(Open ended, but probe for how the initial conversation went with broker. If necessary ask the following: Did the broker suggest any locations that you had not thought of? Did the broker surprise you such that you responded: "I never thought about there;" "I did not know we could afford to live there;" etc...)



27) How many homes did you look at with this broker?

of homes _____

28) In what neighborhoods? (Try to mark as many on the map as possible. Cross out the marker letters if unable to use maps)

Marker	Location/Street Address
A	(Begin with their purchased home)
B	
C	
D	
E	
F	
G	
H	
I	
J	
K	

29) Our records indicate that you paid (\$XXX,000) for the house. Is this correct?

--

30) What was the asking price?

--

31) How did the negotiation process go – were there other people interested in the property that you were competing against? Were there many offers and counter-offers? Was it a quick negotiation or did take a long time?

--



- 32) How do you feel you were treated by the broker/agent during the whole process?
Did you ever feel that the broker/agent discouraged you from pursuing certain housing opportunities?

(Probe on the initial search process as well as on the way in which the broker handled the negotiation process)

- 33) Do you think this broker treated you differently or unfairly because of race/ethnicity? If yes, what makes you feel that way?



34) What was the race/ethnicity of the broker/agent? (Get as specific as possible)

White	_____	[1]	(Specify:_____)
African American	_____	[2]	
Asian American	_____	[3]	
Latino	_____	[4]	
Another	_____	[5]	
Don't know/remember	_____	[6]	

35) Do you think this broker treated you differently or unfairly because of a reason other than your race/ethnicity? (e.g. disability, sexual orientation, religion, etc) If yes, what makes you feel that way?

36) Other than the broker/agent who sold you your house, were there other broker/agents you contacted?

Yes	_____	[1]
No	_____	[2]

If yes, how many?

37) Name of real estate companies and brokers/agents (if possible)

a) Real estate broker (REB) 1



b) Real estate broker (REB) 2

--

c) Real estate broker (REB) 3

--

38) How did you find these broker/agents?

	a) REB 1	b) REB 2	c) REB 3
Name and number on "For Sale" sign			
Family			
Friends			
Other referrals (SPECIFY)			
Newspaper/other publications			
Internet			
Other (SPECIFY)			

39) How many homes did you look at with each real estate broker?

REB 1 _____

REB 2 _____

REB 3 _____

40) Where were you shown homes by each real estate broker?

(Allow interviewees to mark on maps with colored dots. If not possible to locate on maps, track street names)

a) Homes shown by REB 1

Marker	Location/Street Address Shown



b) Homes shown by REB 2

Marker	Location/Street Address Shown

c) Homes shown by REB 3

Marker	Location/Street Address Shown

41) Why did you not purchase homes with these real estate brokers?

	Reason for Not Using Real Estate Brokers
a) REB 1	
b) REB 2	
c) REB 3	

42) How do you feel each real estate broker treated you during the whole process?
Did you ever feel that the broker/agent discouraged you from pursuing certain housing opportunities?

	Treatment by Real Estate Brokers
a) REB 1	
b) REB 2	



c) REB 3	
-----------------	--

- 43) Do you think any of these brokers treated you differently or unfairly because of race/ethnicity? If yes, what makes you feel that way?

	Role of Race/Ethnicity
a) REB 1	
b) REB 2	
c) REB 3	

- 44) What was the race/ethnicity of the broker/agent?

a) REB 1 _____
 b) REB 2 _____
 c) REB 3 _____

- 45) Do you think any of these brokers treated you differently or unfairly because of a reason other than your race/ethnicity? (e.g. disability, sexual orientation, religion, etc) If yes, what makes you feel that way?

	Role of Other Reason
a) REB 1	
b) REB 2	
c) REB 3	



- 46) Did you have the home inspected? If yes, when (at what point in the process)?
How did you find the inspector you used?

Yes _____[1]

No _____[2]

- 47) Did you have a lawyer help you buy your home? If yes, what was his/her name or the name of the company? When did you contact him/her?

Yes _____[1]

No _____[2]

- 48) How were you referred to this lawyer?

Family _____[1]

Friends _____[2]

Broker/agent _____[3]

Newspaper/other publication _____[4]

Co-workers _____[5]

Web/Internet _____[6]

Other (Source: _____) _____[7]

- 49) Where did you purchase a homeowners/property insurance policy (fire, theft & liability)? (Get name of company and agent if present)

- 50) How were you referred to this insurance company/agent?

Family _____[1]

Friends _____[2]

Broker/agent _____[3]

Newspaper/other publication _____[4]

Co-workers _____[5]

Web/Internet _____[6]

Other (Source: _____) _____[7]



51) How much do you pay for your policy per month?

52) How do you feel this insurance company/agent treated you?

53) Do you think this agent treated you differently or unfairly because of **race/ethnicity** or **because of where you were buying a home**? If yes, what makes you feel that way?

54) What was the race/ethnicity of the insurance agent (if one was present)?

White	_____	[1]	(Specify:_____)
African American	_____	[2]	
Asian American	_____	[3]	
Latino	_____	[4]	
Another	_____	[5]	
Don't know/remember	_____	[6]	

55) Did you attempt to purchase a policy from another company? If yes, where you denied? On what grounds? (Get names of companies and agents)

a) Attempted to purchase

Yes	_____	[1]
No	_____	[2]

b) Denied

Yes	_____	[1]
No	_____	[2]



Section V: Getting a Mortgage

Now, I would like to ask you about the financing for your home. Please tell me in your own words how you went about looking for a mortgage loan. We are interested in knowing who you applied to, whether you were turned down by a lender, what sort of choices you were given as to the type of loan you were given, and information about the fees you paid and your interest rate. To help you remember some of this information you may want to consult some of the correspondence you received from the financial institution you were working with, the business cards of the loan officers you talked to, and the documents that you received at closing – the “Truth-in-Lending” statement and the “Settlement Costs” sheet (HUD-1). (To make sure you cover all the necessary information, refer to the questions below)





56) Did you borrow money from a financial institution such as a bank or mortgage bank to buy this home? If no, skip to 64)

Yes _____[1]
No _____[2]

57) When in the home buying process did you start looking for a loan?

58) Who made you the loan?

(Name of loan officer and name of lender. Distinguish between mortgage broker who does not actually make the loan and the mortgage banker or bank/savings bank that actually made the loan.)

59) How did you find this lender?

Family _____[1]
Friends _____[2]
Other referrals _____[3]
Newspaper/other publication _____[4]
Co-workers _____[5]
Web/Internet _____[6]
Other (Source: _____) _____[7]

60) What types of loan did the loan officer tell you about when you were discussing what loan you should get?

61) I would like to know how much you are paying on your mortgage. Do you have any of the documents given to you by the lender at closing such as a Truth-in-Lending statement, or do you have your monthly mortgage statement?

(If possible, have them consult their Truth-in-Lending statement, mortgage statements and denial letters and identify the following:)



- a.) Loan Amount _____
- b.) APR _____
- c.) Amount financed _____
- d.) # of payments _____
- e.) Amount of payments _____
(Record all payments) _____
- f.) Fixed or adjustable _____
- g.) Prepayment penalty _____
- h.) Points paid _____ (May be on p. 2)
- i.) Closing costs _____

62) If no Truth-in-Lending or mortgage statements are available, try to find out what their monthly payment is, and whether that includes taxes and insurance (it normally will). If it does include taxes and insurance, try to get an estimate of what those are:

- a) Monthly payment _____
- b) Taxes and insurance _____ (if included in monthly payment)
- c) Loan amount _____
- d) Term of loan _____ (usually 30 years)

63) How much was your down payment?

Down payment amount _____

64) Was any of this a gift from family or friends?

65) How do you feel the loan officer treated you during the whole process? Did s/he ever discourage you from particular loan products?



- 66) Do you think this loan officer treated you differently or unfairly because of race/ethnicity? If yes, what makes you feel that way?

- 67) What was the race/ethnicity of the loan officer?

White _____ [1] (Specify: _____)
African American _____ [2]
Asian American _____ [3]
Latino _____ [4]
Another _____ [5]
Don't know/remember _____ [6]

- 68) Do you think this loan officer treated you differently or unfairly because of a reason other than your race/ethnicity? (e.g. disability, sexual orientation, religion, etc) If yes, what makes you feel that way?

- 69) Was this lender the only one you contacted?

Yes _____ [1]
No _____ [2]

- 70) Name of mortgage lender and loan officers (if possible)

a) Mortgage lender 1



b) Mortgage lender 2

--

c) Mortgage lender 3

--

71) How did you find these mortgage lenders?

	a) ML 1	b) ML 2	c) ML 3
Family			
Friends			
Referral from real estate broker/agent			
Current bank			
Newspaper/other publications			
Internet/Web			
Other (SPECIFY)			

72) Did you apply for a loan with any of these other mortgage lenders?

Yes _____[1]

No _____[2]

73) Why did you not get a loan from these mortgage lenders? (Specify denial or other reason)

	Reason for Not Getting Loan
a) ML 1	
b) ML 2	
c) ML 3	



- 74) If the application was denied, what reasons did the mortgage lender give?
(Found on denial letters)

	Reason for Denial
a) ML 1	
b) ML 2	
c) ML 3	

- 75) What types of loan terms, fees and interest rates were you offered?

	Term	Fixed/Adjustable	Points	Interest Rate
a) ML 1				
b) ML 2				
c) ML 3				

- 76) How do you feel the loan officers treated you during the whole process? Did any of them ever discourage you from particular loan products?

	Treatment by Mortgage Lenders/Loan Officers
a) ML 1	



b) ML 2	
c) ML 3	

77) Do you think any of these mortgage lenders/loan officers treated you differently or unfairly because of race/ethnicity? If yes, what makes you feel that way?

	Role of Race/Ethnicity
a) ML 1	
b) ML 2	
c) ML 3	

78) What was the race/ethnicity of the mortgage lender/loan officer?

a) ML 1

White	_____ [1]	(Specify: _____)
African American	_____ [2]	
Asian American	_____ [3]	
Latino	_____ [4]	
Another	_____ [5]	
Don't know/remember	_____ [6]	



b) ML 2

White	_____ [1]	(Specify:_____)
African American	_____ [2]	
Asian American	_____ [3]	
Latino	_____ [4]	
Another	_____ [5]	
Don't know/remember	_____ [6]	

c) ML 3

White	_____ [1]	(Specify:_____)
African American	_____ [2]	
Asian American	_____ [3]	
Latino	_____ [4]	
Another	_____ [5]	
Don't know/remember	_____ [6]	

- 79) Do you think any of these mortgage lenders/loan officers treated you differently or unfairly because of a reason other than your race/ethnicity? (e.g. disability, sexual orientation, religion, etc) If yes, what makes you feel that way?

	Role of Other Reason
a) ML 1	
b) ML 2	
c) ML 3	



END OF SECTION



Section VI: Current Housing

80) What is the type of house?

Single family	_____	[1]
Condominium	_____	[2]
2-family/duplex	_____	[3]
Triple-decker or 4 unit apartment	_____	[4]
Large apartment complex (Units _____)	_____	[5]
Other (Type: _____)	_____	[6]

a) If you rent one or more units in your house/building, how much rent do you charge?

81) What do you like about your home and neighborhood? Why?

What don't you like? Why?

(Ask for any other reasons. These should be spontaneous and only list them if they don't volunteer information)

Your unit	_____
Lack of space	_____
Location/Neighborhood	_____
Public School System	_____
Public Safety	_____
Access to Public Transportation	_____
Proximity to Work	_____
Parks/Greenspace	_____
Proximity to Friends, Family, Community	_____
Architecture	_____



82) How many rooms did you have in your previous home?

of bedrooms _____

Living Room _____

of bathrooms _____

Dining Room _____

Kitchen _____

Other rooms _____

Back Yard _____

83) How would you describe your current neighborhood? (Probe about ethnic diversity)

b) How did you feel about its ethnic diversity?

c) How does it compare to your former neighborhood?

d) Which neighborhood's ethnic diversity do you prefer? Why?



84) Is there anything else you would like to add?



Section VII: Household Demographics

85) How many adults live in this household? _____

86) How many children live here?

a) # of children _____

b) ages of children _____

87) Do the school-aged children go to the local public schools? Why or why not?

88) What is the combined household Income (include all adults)

\$0-20,000 _____[1]

\$20,001-40,000 _____[2]

\$40,001-60,000 _____[3]

\$60,001-80,000 _____[4]

\$80,001-100,000 _____[5]

\$100,001-150,000 _____[6]

Over \$150,000 _____[7]

89) In your last home how much was your rent/monthly housing payment?

Previous monthly housing payments _____



Primary Interviewee

- 90) Date of birth _____
- 91) Country of birth _____
- 92) What is your ethnicity? _____ [1] (Specify: _____)
White
African American _____ [2]
Asian American _____ [3]
Latino _____ [4]
Another _____ [5]
- 93) What is your sex? _____ [1]
Female
Male _____ [2]
- 94) What are the primary languages you speak? (Mark all that apply)
Chinese _____
Haitian Creole _____
English _____
Khmer _____
Portuguese _____
Spanish _____
Vietnamese _____
Another (Specify) _____
- 95) What was the last year in school you completed?
Never attended _____ [1]
Some elementary _____ [2]
Completed elementary _____ [3]
Some high school _____ [4]
Completed high school _____ [5]
Some college _____ [6]
Completed college _____ [7]
Grad/professional school _____ [8]
Don't know _____ [9]
- 96) What is your occupation? _____
- 97) Who is your employer? _____
- 98) How do you get to work? Describe your commute.



Additional Adult Household Member #1

- 99) Relation to Primary Interviewee _____
- 100) Date of birth _____
- 101) Country of birth _____
- 102) What is your ethnicity?
- | | | |
|---------------------|-----------|------------------|
| White | _____ [1] | (Specify: _____) |
| African American | _____ [2] | |
| Asian American | _____ [3] | |
| Latino | _____ [4] | |
| Another | _____ [5] | |
| Don't know/remember | _____ [6] | |
- 103) What is your sex?
- | | |
|--------|-----------|
| Female | _____ [1] |
| Male | _____ [2] |
- 104) What are the primary languages you speak? (Mark all that apply)
- | | |
|-------------------|-------|
| Chinese | _____ |
| Haitian Creole | _____ |
| English | _____ |
| Khmer | _____ |
| Portuguese | _____ |
| Spanish | _____ |
| Vietnamese | _____ |
| Another (Specify) | _____ |
- 105) What was the last year in school you completed?
- | | |
|--------------------------|-----------|
| Never attended | _____ [1] |
| Some elementary | _____ [2] |
| Completed elementary | _____ [3] |
| Some high school | _____ [4] |
| Completed high school | _____ [5] |
| Some college | _____ [6] |
| Completed college | _____ [7] |
| Grad/professional school | _____ [8] |
| Don't know | _____ [9] |
- 106) What is your occupation? _____
- 107) Who is your employer? _____
- 108) How do you get to work? Describe your commute.

**Additional Adult Household Member #2**

109) Relation to Primary Interviewee _____

110) Date of birth _____

111) Country of birth _____

112) What is your ethnicity?

White _____ [1] (Specify: _____)

African American _____ [2]

Asian American _____ [3]

Latino _____ [4]

Another _____ [5]

113) What is your sex?

Female _____ [1]

Male _____ [2]

114) What are the primary languages you speak? (Mark all that apply)

Chinese _____

Haitian Creole _____

English _____

Khmer _____

Portuguese _____

Spanish _____

Vietnamese _____

Another (Specify) _____

115) What was the last year in school you completed?

Never attended _____ [1]

Some elementary _____ [2]

Completed elementary _____ [3]

Some high school _____ [4]

Completed high school _____ [5]

Some college _____ [6]

Completed college _____ [7]

Grad/professional school _____ [8]

Don't know _____ [9]

116) What is your occupation? _____

117) Who is your employer? _____

118) How do you get to work? Describe your commute.



Mitt Romney
Governor

Kerry Healey
Lieutenant Governor

Eric A. Kriss
Secretary

THE COMMONWEALTH OF MASSACHUSETTS
COMMISSION AGAINST DISCRIMINATION
ONE ASHBURTON PLACE, BOSTON, MA 02108-1518



Dorca I. Gómez
Chairwoman

Walter J. Sullivan, Jr.
Commissioner

Cynthia A. Tucker
Commissioner

This letter is in invitation to participate in an important study on real estate practices sponsored by the Commonwealth of Massachusetts. Through a search of public records, you were identified as a recent homebuyer in Massachusetts. We are interested in learning more about your home buying experience.

In the coming weeks, an interviewer from the Massachusetts Commission Against Discrimination will contact you. If you agree, the interviewer will set up an appointment for a personal interview in your home. The interview will last from 60-90 minutes and you will be reimbursed \$25 for your time. We are able to conduct the interview in English, Chinese, Haitian Kreyol, Khmer or Spanish.

I must stress that participation, though highly encouraged, is voluntary. The results will be published in public reports and academic journal articles. However, your identity will be kept strictly confidential. In some cases, we may ask you to participate in a follow-up interview to find out whether specific individuals and firms are involved in practices that are in violation of federal and state fair housing laws. Should you be selected for a follow-up interview, we will contact you to explain the process more fully, after which you may decide whether you wish to participate.

If you have any questions, you may contact me at (617) 779-8893 or via email at george.cheung@state.ma.us.

Sincerely,

George Cheung
Project Director

Tel: (617) 994-6000

TTY: (617) 994-6196

Fax: (617) 994-6024





Mitt Romney
Governor

Kerry Healey
Lieutenant Governor

Eric A. Kriss
Secretary

THE COMMONWEALTH OF MASSACHUSETTS
COMMISSION AGAINST DISCRIMINATION
ONE ASHBURTON PLACE, BOSTON, MA 02108-1518



Dorca I. Gómez
Chairwoman

Walter J. Sullivan, Jr.
Commissioner

Cynthia A. Tucker
Commissioner

Por la presente deseo extenderle una invitación a participar en un importante estudio sobre prácticas de bienes raíces que auspicia el Estado de Massachussets. Los archivos públicos nos indican que usted ha comprado recientemente una vivienda en Massachussets, y nos interesa saber sobre su experiencia de compra del inmueble.

En las próximas semanas un encuestador de la Comisión Contra la Discriminación de Massachussets se pondrá en contacto con usted. Si Ud. está de acuerdo en participar en el estudio, podrá acordar con el encuestador una cita para una entrevista personal en su domicilio. Luego de la entrevista, que durará entre 60 y 90 minutos, usted recibirá 25 dólares en compensación por su tiempo. La entrevista podrá ser realizada en inglés, español o lengua creole de Haiti.

Debo recalcar que su participación, aunque muy valiosa, es voluntaria. Los resultados serán publicados en informes públicos y en artículos académicos, pero su identidad será mantenida en la más estricta confidencialidad. Es posible que más adelante le pidamos que participe en una segunda entrevista, con el fin de averiguar si algún individuo o alguna firma específica están incurriendo en prácticas que violan las leyes federales o estatales de vivienda. En caso de ser seleccionado para una entrevista de seguimiento, en su momento le explicaremos el proceso con mayor detalle, de modo que usted pueda decidir si desea o no participar.

Si desea saber más sobre el tema puede contactarme por teléfono (617) 779-8893 o vía correo electrónico: george.cheung@state.ma.us.

Agradeciéndole por la atención prestada, le saludo.

Atentamente,

George Cheung
Director del Proyecto





THE COMMONWEALTH OF MASSACHUSETTS
COMMISSION AGAINST DISCRIMINATION
ONE ASHBURTON PLACE, BOSTON, MA 02108-1518



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Commissioner

Cynthia A. Tucker
Commissioner

Thank you for agreeing to participate in the Massachusetts Commission Against Discrimination Commonwealth Homebuyer Survey. Your participation is very important to us, and we appreciate your taking the time to meet with (researcher), who will conduct the interview.

To help us make the best use of your time please look in your records to find any information you gathered when you were buying your home. Information such as brochures, business cards of real estate agents, or other information will help you remember who helped you in your home search and what properties you looked at. We will also be asking you questions about how you financed your home purchase, and would greatly appreciate it if you are able to find copies of your "Truth-in-Lending Statement" and "Settlement Statement" that you were given at closing. If you cannot find these, your latest mortgage statement will provide much of the information we will be asking you about.

Once again, let me reassure you that the information you provide us is strictly confidential. If you have any questions about how we will protect your confidentiality, please feel free to ask our interviewer or call me at the number below.

Your interview is scheduled for (date) with (researcher). At the end of the interview (researcher) will help you complete three standard state forms, which we will allow us to pay you \$25 for your time. We will send you a check as soon as the processing is complete.

If you have any questions, please contact me directly at (617) 779-8893 or at george.cheung@state.ma.us. Thank you again for agreeing to participate in this important study.

Sincerely,

George Cheung
Project Director





CONSENT FORM

You are being asked to participate in a research study conducted by the Massachusetts Commission Against Discrimination.

Participation in phase one of this project will involve answering interview questions regarding your recent home buying experience. Participation is entirely voluntary and you may withdraw at any time. The results of the survey will be published in public reports and academic journal articles, and your identity will be kept strictly confidential in those reports and articles.

In the second phase of the project, some people who have responded to the survey may be asked if they would be willing to be interviewed about their homebuying experience in order to ascertain whether specific individuals and firms are involved in practices that are in violation of federal and state fair housing laws. Should you be eligible for further participation, we will contact you to explain the second phase more fully, after which you may decide whether you wish to participate in the second phase.

The nature and purpose of this research have been satisfactorily explained to me and I agree to become a participant in the study described as phase 1, above. I understand that I am free to discontinue participation at any time if I so choose, and that the investigator will gladly answer any questions that arise during the course of the research.

(date)

(subject's signature)

(print name)

760 CMR 47.00: Affirmative Action Regulations Governing Recipients of EOCD/DCA Financial Assistance

47.01: Declaration of Policy

- (1) Non-discrimination and equal opportunity are the policy of the Executive Office of Communities and Development/Department of Community Affairs (EOCD/DCA) in all of its decisions, policies, programs and activities. To that end, all EOCD/DCA employees shall rigorously take affirmative steps to ensure equality of opportunity in the internal affairs of EOCD/DCA, as well as in its relations with the public. EOCD/DCA, in performing its statutory responsibilities, shall consider the likely effects which its decisions, policies, programs and activities shall have in meeting the goal of equality opportunity.
- (2) Affirmative Action requires more than vigilance in the elimination of discriminatory barriers on the grounds of race, color, creed, national origin, handicap, sex, age, language, military service and sexual orientation. It also entails positive and aggressive measures to ensure equal opportunity in internal personnel practices and in those policies and programs which affect persons and political subdivisions throughout the Commonwealth.
- (3) EOCD/DCA shall initiate, where appropriate, affirmative action policies and programs designed to remedy the lingering effects of any past and present discriminatory patterns and practices to the extent that such policies and programs are consistent with purposes and provisions of M.G.L. c.151B, and Executive Orders 227, 237, 246, and 253, as amended.

47.02: Purpose

- (1) 760 CMR 47.00 is designed to provide a framework within which the EOCD/DCA can design and implement policies and programs to ensure equal opportunity and full participation for all citizens of the Commonwealth.
- (2) 760 CMR 47.00 is also intended to define the equal employment opportunity, fair housing, business utilization, and affirmative action obligations of any applicant for state, state-assisted, federal or federally-assisted funds administered by the Secretary of EOCD/DCA.

47.03: Definitions

Applicant means any person, private for-profit or non-profit organization, or political subdivision of the Commonwealth which submits to the EOCD/DCA any application, contract, request, or plan for financial assistance from the EOCD/DCA which the Secretary is not obliged by law to fund.

Clearinghouse means any individual, organization, or agency established for, among other reasons, the purpose of furthering fair housing opportunities on a regional or city-wide basis.

Commission means the Massachusetts Commission Against Discrimination (MCAD).

DCA means the Department of Community Affairs.

EOCD/DCA means the Executive Office of Communities and Development.

Financial Assistance means:

- (a) any grant, loan or advance of state or federal funds,
- (b) grant or donation of state or federal property or interest in property
- (c) any state or deferral agreement, arrangement, or other contract which has as one of its purposes the provision of assistance, such as the allocation of federal or state tax credits, tax-exempt bond authority, or loan guarantees, and/or
- (d) the sale, lease, or licensing of state or federal property, both real and personal, or any interest in such property, at a price below the current market value of such property interest.

LHA means a Local Housing Authority as established under M.G.L. c.121B or comparable legislation

MBE means a business organization which is beneficially owned and controlled 51% or more by one or more Minority Group Members and is certified as such by the Massachusetts State Office of Minority and Women's Business Affairs.

Minority Group Member means a person who is of one of the following groups:

- (a) Native American or Alaskan Native – A person having origins in any of the original people of North America, and who maintain cultural identifications through tribal affiliations or community recognition.
- (b) Asian or Pacific Islander – A person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian Sub-continent, or the Pacific Islands. This areas includes, for example, China, India, Japan, Korea, the Philippine Islands and Samoa.
- (c) Black – A person having origins in any of the black racial groups of Africa.
- (d) Hispanic – A person of Mexican, Puerto Rican, Cuban, Dominican, Central or South American origin.
- (e) Cape Verdean – A person having origins in the Cape Verde Islands.

Political Subdivisions means any unit of local government, city, town, county, or subdivision thereof; instrumentality of the Commonwealth; or any other government entity, including authorities.

Secretary means the Secretary of the Executive Office of Communities and Development/Department of Community Affairs.

WBE means a business organization which is beneficially owned and controlled 51% or more by one or more women and is certified as such by the Massachusetts State Office of Minority and Women's Business Affairs.

47.04: Role of the Executive Office of Communities and Development

EOCD/DCA is the Commonwealth's lead housing and community development agency. In this capacity, it is charged with addressing the management, housing, and community development needs of the Commonwealth's 351 cities and towns. EOCD/DCA is also charged with coordinating the Commonwealth's overall long-term housing and community development strategy.

(1) In deciding whether to award financial assistance to an applicant, the Secretary shall consider whether the applicant is in compliance with applicable civil right obligations, as determined by the Commission, in the areas of housing, employment, and MBE/WBE utilization. The Secretary shall review the reasons for the Commission's determination, giving substantial weight to the Commission's recommendation. To facilitate the Secretary's review of the applicant's civil rights record, the Secretary shall implement the following procedures, which were initially the subject of a Memorandum of Agreement between EOCD/DCA and the Commission dated March 22, 1985:

(a) Notify the Commission on an annual basis of projected rounds of funding of discretionary non-entitlement programs administered by EOCD/DCA to be awarded to municipalities and local housing authorities or to private applicants. Such notice shall include:

1. Anticipated dates of program funding cycles,
2. Types of applications,
3. Program funding value
4. Funding source, and
5. Applicant selection criteria
 - i. notify the Commission of any changes or program modifications which would affect the Commission/EOCD review system;
 - ii. inform applicants of the requirements of 760 CMR 47.00;
 - iii. notify the Commission at the time of issuing a Request for Proposals (RFP) for financial assistance to applicants and provide the following:
 1. a copy of the notice,
 2. a list of prospective applicants receiving the notice,
 3. the date responses to the RFP are due,
 4. the anticipated date of final funding decision, and
 5. the anticipated award date

Where the Secretary anticipates the provision of financial assistance to an applicant without resort to an RFP, the Secretary will also notify the Commission of such proposed action and provide the Commission with ample opportunity to notify EOCD/DCA as to whether the applicant is in compliance with applicable civil rights laws.

- iv. upon notification by the Commission that an applicant is in apparent non-compliance status, direct the applicant to make a sincere and concerted effort to reach agreement with the Commission which will bring the applicant into compliance.

- v. not award funds to an applicant that the Commission finally determines to be in non-compliance status, as provided in 760 CMR 47.05(1) herein, unless after reviewing the reasons for the Commission's determination, the Secretary finds that the proposal or project is necessary for the protection of the public health or welfare and the applicant has made a sincere and concerted effort to reach agreement with the Commission as required by 760 CMR 47.04(1)(a)5. Any such finding shall be forwarded in writing to the Commission.
- vi. to award funds to an applicant that the MCAD determines to be in conditional status, as provided in 760 CMR 47.05(1)(h)2. herein, only where the Secretary determines, after consultation with the Commission, that the imposition of certain conditions on such award will further the applicant's ability and willingness to comply with applicable civil rights requirements. If an applicant fails to comply with these conditions during the period of such award, the Commission may conclude that such failure warrants a determination that the applicant is in non-compliance.
- vii. The Secretary shall appoint an Affirmative Action Officer who shall have, among other things, the following authority and responsibilities:
 - 1. Establish reporting requirements for all successful applicants relative to their compliance with the obligations under 760 CMR 47.00;
 - 2. Gather information, and report such information regularly to the Commission, relative to successful applicants' compliance with the obligations under 760 CMR 47.00;
 - 3. Track and advise the Secretary relative to program compliance with equal opportunity obligations of Executive Order 227;
 - 4. Recommend approval or disapproval of all EOCD/DCA appointments and EOCD/DCA funded construction contracts;
 - 5. Supervise monitoring and enforcement of EOCD/DCA's Affirmative Action Plan as described in 760 CMR 47.06 herein;
 - 6. Inform and otherwise assist EOCD/DCA program managers regarding the substance of any civil rights comments provided by the Commission, as well as of any compliance conditions imposed by EOCD/DCA on the award of financial assistance.
 - 7. In concert with EOCD's Chief Counsel, inform EOCD/DCA program managers of any changes in applicable civil rights laws and policies; and

8. In concern with EOCD's Chief Counsel, provide instruction to EOCD/DCA program staff on civil rights compliance and procedures of tracking compliance.

47.05: Role of the Massachusetts Commission Against Discrimination

The Commission is the Commonwealth's designated civil rights monitoring and enforcement agency in the areas of employment, housing, and business utilization pursuant to M.G.L. c. 151B, as amended, and Executive Order No. 227, entitled Governor's Code for Fair Practices. As a matter of legal authority, administrative structure and resources, and experience, the Commission is uniquely qualified to make determinations concerning the compliance of applicants with applicable civil rights laws. Therefore, in furtherance of 760 CMR 47.00, EOCD/DCA shall rely on the determination of the Commission relative to an applicant's record of compliance with applicable civil rights requirements, based on the following Commission assistance:

- (1) notify EOCD/DCA in writing every four months of the compliance or non-compliance status of municipalities and local housing authorities (LHA's) throughout the Commonwealth;
- (2) notify EOCD/DCA, not less than one week prior to the date RFP responses are due, whether the compliance status of any municipality or LHA's referred to in 760 CMR 47.00 is subject to change and, if so, the substance of any anticipated change. Any such municipality or LHA subject to such change shall be in "conditional status" for the purpose of 760 CMR 47.00; and
- (3) recommend to the Secretary a form(s) for notifying applicants of their civil rights obligations as defined in Executive Order No. 227, and all other applicable federal and state civil rights requirements.

760 CMR 47.00: Affirmative Action Regulations Governing Recipients of EOCD/DCA Financial Assistance

47.01: Declaration of Policy

- (1) Non-discrimination and equal opportunity are the policy of the Executive Office of Communities and Development/Department of Community Affairs (EOCD/DCA) in all of its decisions, policies, programs and activities. To that end, all EOCD/DCA employees shall rigorously take affirmative steps to ensure equality of opportunity in the internal affairs of EOCD/DCA, as well as in its relations with the public. EOCD/DCA, in performing its statutory responsibilities, shall consider the likely effects which its decisions, policies, programs and activities shall have in meeting the goal of equality opportunity.
- (2) Affirmative Action requires more than vigilance in the elimination of discriminatory barriers on the grounds of race, color, creed, national origin, handicap, sex, age, language, military service and sexual orientation. It also entails positive and aggressive measures to ensure equal opportunity in internal personnel practices and in those policies and programs which affect persons and political subdivisions throughout the Commonwealth.
- (3) EOCD/DCA shall initiate, where appropriate, affirmative action policies and programs designed to remedy the lingering effects of any past and present discriminatory patterns and practices to the extent that such policies and programs are consistent with purposes and provisions of M.G.L. c.151B, and Executive Orders 227, 237, 246, and 253, as amended.

47.02: Purpose

- (1) 760 CMR 47.00 is designed to provide a framework within which the EOCD/DCA can design and implement policies and programs to ensure equal opportunity and full participation for all citizens of the Commonwealth.
- (2) 760 CMR 47.00 is also intended to define the equal employment opportunity, fair housing, business utilization, and affirmative action obligations of any applicant for state, state-assisted, federal or federally-assisted funds administered by the Secretary of EOCD/DCA.

47.03: Definitions

Applicant means any person, private for-profit or non-profit organization, or political subdivision of the Commonwealth which submits to the EOCD/DCA any application, contract, request, or plan for financial assistance from the EOCD/DCA which the Secretary is not obliged by law to fund.

Clearinghouse means any individual, organization, or agency established for, among other reasons, the purpose of furthering fair housing opportunities on a regional or city-wide basis.

Commission means the Massachusetts Commission Against Discrimination (MCAD).

DCA means the Department of Community Affairs.

EOCD/DCA means the Executive Office of Communities and Development.

Financial Assistance means:

- (a) any grant, loan or advance of state or federal funds,
- (b) grant or donation of state or federal property or interest in property
- (c) any state or deferral agreement, arrangement, or other contract which has as one of its purposes the provision of assistance, such as the allocation of federal or state tax credits, tax-exempt bond authority, or loan guarantees, and/or
- (d) the sale, lease, or licensing of state or federal property, both real and personal, or any interest in such property, at a price below the current market value of such property interest.

LHA means a Local Housing Authority as established under M.G.L. c.121B or comparable legislation

MBE means a business organization which is beneficially owned and controlled 51% or more by one or more Minority Group Members and is certified as such by the Massachusetts State Office of Minority and Women's Business Affairs.

Minority Group Member means a person who is of one of the following groups:

- (a) Native American or Alaskan Native – A person having origins in any of the original people of North America, and who maintain cultural identifications through tribal affiliations or community recognition.
- (b) Asian or Pacific Islander – A person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian Sub-continent, or the Pacific Islands. This areas includes, for example, China, India, Japan, Korea, the Philippine Islands and Samoa.
- (c) Black – A person having origins in any of the black racial groups of Africa.
- (d) Hispanic – A person of Mexican, Puerto Rican, Cuban, Dominican, Central or South American origin.
- (e) Cape Verdean – A person having origins in the Cape Verde Islands.

Political Subdivisions means any unit of local government, city, town, county, or subdivision thereof; instrumentality of the Commonwealth; or any other government entity, including authorities.

Secretary means the Secretary of the Executive Office of Communities and Development/Department of Community Affairs.

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- (3) recommend to the Secretary a form(s) for notifying applicants of their civil rights obligations as defined in Executive Order No. 227, and all other applicable federal and state civil rights requirements.

GLOSSARY OF TERMS

Attribute

A characteristic of a geographic feature described by numbers, characters, images and CAD drawings, typically stored in tabular format and linked to the feature by a user-assigned identifier (e.g., the attributes of a well might include depth and gallons per minute).¹

Database

A logical collection of interrelated information, managed and stored as a unit, usually on some form of mass-storage system such as magnetic tape or disk. A GIS database includes data about the spatial location and shape of geographic features recorded as points, lines, areas, pixels, grid cells...as well as their attributes.²

FAIR Plan

FAIR Plans are the outgrowth of the national emergency created by three years of rioting in American cities, beginning with the Watts outbreak in 1965. [In response,] Congress enacted the Urban Property Protection and Reinsurance Act of 1968, which authorized the establishment of FAIR Plans (Fair Access to Insurance Requirements) and made available federal riot reinsurance to the companies. The Massachusetts Legislature responded with the enactment of chapter 731 of the Acts of 1968, which formed the Massachusetts Property Insurance Underwriting Association (MPIUA) under regulatory supervision of the Massachusetts Insurance Department. MPIUA, also known as the FAIR Plan in Massachusetts, is a residual market insurance association in which all companies writing basic property insurance in the Commonwealth are required to participate with losses shared among the member companies on a premium volume basis...The FAIR plan operates similar to that of a normal insurance company in that it underwrites and inspects risks, accepts premium, issues policies and adjusts claims.³

Geocode

The process of identifying the coordinates of a location given its address. For example, an address can be matched against a TIGER street network to determine the location of a home. Also referred to as address geocoding.⁴

GIS

Geographic information system. An organized collection of computer hardware, software, geographic data, and personnel designed to efficiently capture, store, update, manipulate, analyze, and display all forms of geographically referenced information.⁵

HMDA

The Home Mortgage Disclosure Act was enacted by Congress in 1975 and is implemented by the Federal Reserve Board's Regulation C. This regulation provides the public loan data that can be used to assist:

- in determining whether financial institutions are serving the housing needs of their communities;
- public officials in distributing public-sector investments so as to attract private investment to areas where it is needed;
- and in identifying possible discriminatory lending patterns.

This regulation applies to certain financial institutions, including banks, savings associations, credit unions, and other mortgage lending institutions. In 2003, there were approximately 31 million loan records for calendar year (CY) 2002 reported by 7,771 financial institutions.⁶

Insurance Redlining

The practice or policy of refusing to write an insurance product or varying the terms of an insurance product because of the geographical location of the property and because of the racial or ethnic composition of the area.⁷

Raster

A cellular data structure composed of rows and columns for storing images. Groups of cells with the same value represent features.⁸

Summary File 1 (SF 1)

Summary File 1 contains population and housing data based on Census 2000 questions asked of all people and about every housing unit. A total of 286 data tables are included in this file. Population items include: sex, age, race, Hispanic or Latino origin, household relationship, and household and family characteristics. Housing items include occupancy status and tenure (whether the unit is owner- or renter-occupied).⁹

Summary File 2 (SF 2)

Summary File 2 contains population and housing data based on Census 2000 questions asked on the short form of everyone. SF 2 contains 47 tables: 36 population tables and 11 housing tables. What makes SF 2 special is that tables are repeated for up to 249 race and Hispanic origin groups, provided there are 100 or more people in the group for a particular area. Population items age, sex, race, Hispanic origin, and household type and relationship. Housing tenure is also included.¹⁰

Summary File 3 (SF 3)

Summary File 3 contains population and housing data based on Census 2000 questions asked on the long form of a one-in-six sample of the population. SF 3 contains 813 tables: 484 population tables and 329 housing tables. Population

items include marital status, disability, educational attainment, occupation, income, ancestry, veteran status, and many other characteristics. Housing items include tenure (whether the unit is owner- or renter-occupied), occupancy status, housing value, mortgage status, price asked, and more.¹¹

Summary File 4 (SF 4)

Summary File 4 contains population and housing data based on Census 2000 questions asked on the long form of a one-in-six sample of the population. SF 4 contains 323 tables: 213 population tables and 110 housing tables. Population items include marital status, disability, educational attainment, occupation, income, ancestry, veteran status, and many other characteristics. Particularly detailed is the occupation and industry data. Housing items include tenure (whether the unit is owner- or renter-occupied), occupancy status, housing value, mortgage status, price asked, and more. Each table is iterated for 336 population groups: the total population, 132 race groups, 78 American Indian and Alaska Native tribe categories (reflecting 39 individual tribes), 39 Hispanic or Latino groups, and 86 ancestry groups where the geographic areas have a population of more than 100 persons in that group and where they have 50 or more unweighted sample cases of the specific population.¹²

TIGER® Files

The Topologically Integrated Geographic Encoding and Referencing data format used by the U.S. Census Bureau to support census programs and surveys...TIGER files contain street address ranges along lines and census tract/block boundaries. This descriptive data can be used to associate address information and census/demographic data with coverage features.¹³

Vector

A coordinate-based data structure commonly used to represent linear geographic features. Each linear feature is represented as an ordered list of vertices.¹⁴

Sources

¹ ESRI GIS Glossary (www.esri.com/library/glossary/glossary.html)

² *ibid*

³ Massachusetts Property Insurance Underwriters Association (www.mpiua.com/aboutus.asp)

⁴ ESRI GIS Glossary (www.esri.com/library/glossary/glossary.html)

⁵ *ibid*

⁶ Federal Financial Institutions Examination Council (www.ffiec.gov/hmda/history.htm)

⁷ Squires and Venez., "Insurance Redlining and the Process of Discrimination,," *The Review of Black Political Economy*, Winter 1988.

⁸ ESRI GIS Glossary (www.esri.com/library/glossary/glossary.html)

⁹ US Census (www.census.gov)

¹⁰ *ibid*

¹¹ *ibid*

¹² *ibid*

¹³ ESRI GIS Glossary (www.esri.com/library/glossary/glossary.html)

¹⁴ *ibid*